

Comment Letter I51

From: C20_Sailor <c20_sailor@yahoo.com>
Sent: Thursday, March 01, 2018 1:46 PM
To: LUEG, PalomarMP
Subject: Comments on the McClellan-Palomar Master Plan Updates
Attachments: Palomar Master Plan Update Comments.pdf

Attached in a PDF file.

Sincerely,

Lonnie and Anne Smith
Carlsbad, CA

I51-1

**Comments on the 2018 McClellan-Palomar Airport Master Plan Update
February 28, 2018**

Submitters:

Lonnie and Anne Smith
2636 Sausalito Avenue
Carlsbad, CA 92010
c20_sailor@yahoo.com

Item 1.

We would like to compliment the County and its consultants on producing a very comprehensive and detailed presentation for the public, and the thorough public meeting Lonnie attended on February 13, 2018.

I51-1
cont.

Item 2.

After looking closely at each of the alternative plans envisioned within the Master Plan Update, the **Preferred Alternative** is indeed the best choice, and the one we endorse as a local residents of the area. Although each alternative adds value to the current airport configuration, it only makes sense to prepare for the most likely future developments, and the **Preferred Alternative** best matches our expectation about how McClellan-Palomar will be used in the future.

Item 3.

Our region is in desperate need of additional air travel alternatives. Both Lindbergh Field and John Wayne International are becoming more and more difficult to use for North County residents. Frankly, after looking at the time, money, frequent delays and general inconvenience of traveling to regional destinations in California using either of the above airports, my wife and I usually opt for jumping in the car and driving there instead.

I51-2

My feeling is that from an ecological point of view, driving is the poorer solution compared to flying there from Carlsbad. We likely burn more fuel, produce more pollution and consume more time driving, but the hassle of using Lindbergh or John Wayne makes it more attractive to us.

We realize that the **Preferred Alternative** does not guarantee additional airline service through McClellan-Palomar, but we are hopeful it will make it more attractive to regional airlines. From the point of view of North County residents, it would be wonderful if more regional destinations do become available to us.

Item 4.

We would like to suggest that the County as part of its analysis do at least a preliminary study of the resources consumed, and pollution created in each of two travel scenarios from Carlsbad to regional destinations such as Fresno/Yosemite, Oakland, San Francisco, Sacramento, Reno, NV and Phoenix, AZ and maybe even Los Angeles. Compare the pollution and fuel use factors for two people traveling by car versus flying in a C-III or D-III aircraft. I think the results might favor the airplanes, hence be an ecological improvement. That would be an important benefit for our state.

I51-3

Item 5.

Beware of "Chicken Little" responses from the public. Our local social media is full of ridiculous claims by detractors such as: 757 and 747 aircraft will now begin operating out of McClellan-Palomar; new construction will cause release of dangerous, toxic substances into our local environment; and that C-III and D-III aircraft will be more polluting and noisy than the current, older fleet of jets.

I51-4

Page 2

Comments continued:

Lonnie and Anne Smith
2636 Sausalito Avenue
Carlsbad, CA 92010
c20_sailor@yahoo.com

Item 6.

On various days, and times of day, aircraft approaching McClellan-Palomar pass over our home. We are not bothered by this. However, some people in other neighborhoods closer to the airport do appear to experience regular annoyances, mostly from propeller driven aircraft. We would urge the County to use whatever influence it has with the FAA, asking them to do a fair-minded examination of what can be done to lessen the sound impact of planes approaching and departing McClellan-Palomar in future, including possibly restricted operations in late night and early morning hours.

I51-5

Thank you for your consideration of our views.

Sincerely,

Lonnie & Anne Smith

Response to Letter I51**Lonnie and Anne Smith**

- I51-1** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I51-2** This comment states support for the proposed project and stresses that safety is important. While this comment does not specifically address the adequacy or accuracy of the environmental analysis provided in the PEIR, this comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I51-3** This comment recommends conducting a travel analysis comparing aircraft and ground vehicle to determine which method would produce less pollution and result in fuel savings. The environmental analysis conducted for the Master Plan Update was conducted following County Guidelines and in compliance with Federal and State requirements. As this comment does not specifically identify an environmental issue with the Draft PEIR analysis or proposed mitigation, no changes to the Draft PEIR have been made in response to this comment.
- I51-4** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I51-5** The County acknowledges the comments; however, they do not raise an issue concerning the analysis of adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Please refer to **Master Response 3 (Voluntary Noise Abatement Procedures)** and **Master Response 7 (FAA Involvement and Oversight)**. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

Regarding the commenter's concern of aircraft noise, County staff researched the location provided by this comment and confirmed the location is outside of the 65dB contour (i.e., less than 65dB) under all scenarios. Specifically, the existing noise condition at the location provided was estimated to be 37.92dB, and its future condition without the Proposed Project is estimated to be 37.70dB. Assuming full implementation of the Proposed Project (PAL 2), the estimated future noise condition would be 38.73dB. This is below the threshold of significance of 65dB CNEL. Although the comment pertains to existing noise conditions, there is no evidence the Proposed Project would result in significant noise impacts. Therefore, because the location would be outside of the 65dB contour, no significant noise impacts would occur, and no changes to the PEIR are required. Please refer to Master Responses 1 and 4 in addition to PEIR Appendix D for more information about the supplemental noise analysis conducted for additional locations.

Comment Letter I52

From: Tom@ClarkInt.com <clarkint@gmail.com> on behalf of tom clark
<tom@clarkint.com>
Sent: Sunday, March 04, 2018 8:25 AM
To: LUEG, PalomarMP
Subject: airport expansion

I'm a local resident for 16 years

Year after year more private planes fly in a random fly patterns after take- off low and over local residence homes. Planes also take off at all hours of the day –

There should be certain hours of take-offs and landings and there should be a flight pattern to the ocean and then the plane should turn. These two things were promised by the airport for years and have so far not come to fruition. That being said, I'm doubtful of the plans that are put forth in this expansion plan will benefit the local residence. What the airport has said in the past and what it's done seems to be two different things.

I52-1



Phone: 858-227-3087
Fax: 858-227-5082
Email: tom@clarkint.com
www.clarkint.com

Response to Letter I52**Tom Clark**

- I52-1** As discussed in Section 2.4 of the Master Plan Update, the County has implemented the VNAP, a voluntary program initiated by the County to communicate with pilots regarding flight path and altitude recommendations to avoid noise sensitive residential areas. Please also refer to **Master Response 3 (Voluntary Noise Abatement Procedures)**. The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

Regarding the commenter's concern of aircraft noise, County staff reviewed this comment for any site-specific location data of the perceived noise. However, the comment does not contain a sufficient location for the County to further study or analyze the noted noise concerns. Although the comment pertains to existing noise conditions, there is no evidence the Proposed Project would result in significant noise impacts. Please refer to Master Responses 1 and 4 in addition to PEIR Appendix D for more information about the supplemental noise analysis conducted for additional locations.

Comment Letter I53

From: Barrett, Susan <sbarrett@buchalter.com>
Sent: Monday, March 05, 2018 3:38 PM
To: Curtis, Cynthia
Cc: Lichman, Barbara
Subject: Comments by The Westoaks Project Owner, LLC a Delaware Limited Liability Company re: DPEIR, McClellan-Palomar Airport Master Plan Update
Attachments: Comments on Draft PEIR 03.05.18.PDF

Please see the attached comments on the Draft Program Environmental Impact Report, McClellan-Palomar Airport Master Plan Update. I53-1

Susan Barrett for Barbara E. Lichman, Ph.D.

Buchalter

A Professional Corporation

18400 Von Karman Avenue, Suite 800 | Irvine, CA 92612-0514

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March 5, 2018

949.224.6292 Direct
blichman@buchalter.com

VIA E-MAIL (CYNTHIA.CURTIS@SDCOUNTY.CA.GOV)

Cynthia Curtis
County of San Diego
Department of Public Works
Airports Division
5510 Overland Avenue, Suite 410
San Diego, CA 92123

Re: Comments by The Westoaks Project Owner, LLC a Delaware Limited Liability Company, Regarding Draft Program Environmental Impact Report, McClellan-Palomar Airport Master Plan Update, SCH# 2016021105

Dear Ms. Curtis:

We represent The Westoaks Project Owner, LLC a Delaware Limited Liability Company ("Owner") concerning the Airport Master Plan Update for McClellan-Palomar Airport, as set forth above. This letter constitutes the comments by Owner on the Draft Program Environmental Impact Report ("DPEIR") for the project.

Please be advised that at this time, Owner, having thoroughly reviewed the DPEIR, does not currently have substantive comments. However, Owner requests timely notification of changes, if any, to the DPEIR; circulation of the Final PEIR; and/or any subsequent, project level, environmental review for any subsidiary project included in the DPEIR.

I53-1
cont.

buchalter.com

Los Angeles
Napa Valley
Orange County
Sacramento
San Francisco
Scottsdale

BN 32089250v1

Buchalter

Cynthia Curtis
March 5, 2018
Page 2

Owner appreciates the County's current efforts, and looks forward to its future cooperation in these matters.

↑ I53-1
cont.

Sincerely,

BUCHALTER
A Professional Corporation



Barbara Lichman

BN 32089250v1

Response to Letter I53

Barbara Lichman
(representing Westoaks Project Owner, LLC)

- I53-1** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

Comment Letter I54

From: areysbergen@juno.com
Sent: Thursday, March 08, 2018 9:42 AM
To: LUEG, PalomarMP
Cc: Curtis, Cynthia
Subject: Benefits of Airfield Alternative 1

5.6.1.2 Benefits of Airfield Alternative 1

◆H **Construction of EMAS enhances airfield safety**
◆H ***Lower estimated construction cost*** as runway maintains existing configuration
◆H Improves areas at Runway End 06, including areas on blast pad that exceed B-II grading design standards
◆H Improvements remain on Airport property, minimal adverse impact to landside or off-Airport activity
◆H Minimal impact (encroachment) on general aviation/FBO operations
◆H ***Satisfies Airport users who have identified that maintaining existing runway width is extremely important***
◆H The alternative does not impact existing North Ramp area or aircraft parking in that area
◆H No change in the size of runway protection zones
◆H **No direct impacts** to immediately adjacent offsite development or **roadways**

as a resident, property owner in Carlsbad and registered VOTER in San Diego County ..
I earnestly request that Airfield Alternative 1 be adopted...
thank you,
alice reysbergen

I54-1

Response to Letter I54**Alice Reysbergen**

- I54-1** This comment states support for Alternative 1 of the Master Plan Update; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

Comment Letter I55

From: Barbara Swearingen <babsinc@roadrunner.com>
Sent: Thursday, March 08, 2018 5:58 AM
To: LUEG, PalomarMP
Subject: master plan comment

Please register my comment as a NO to expanding the airport to include larger jets and more commercial service. We don't need it, we are not that far from San Diego Airport. Granted the airport was here first, but the community has grown around it and needs to be respected to maintain the quality of life we are losing in Carlsbad and California.

I55-1

Barbara Swearingen
3030 Glenbrook St.
Carlsbad, CA

31 years a resident

Response to Letter I55**Barbara Swearingen**

- I55-1** The County acknowledges the comments; however, they do not raise an issue concerning the analysis of adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

Comment Letter I56

County of San Diego, Attn: Cynthia Curtis
5510 Overland Avenue, Suite 410
San Diego, CA 92123

March 12, 2018

Ref: Noise Data related to the Expansion of McClellan-Palomar Airport

To whom it may concern:

I live 2½ miles from the McClellan-Palomar Airport in Bressi Ranch, Carlsbad, 92009. For the last 4 years there has been an increase of Jet noise from the airport during what is called quiet hours. Specifically, most Mondays between 3 AM and 6 AM.

Because of my concerns, 2 years ago I began attending the monthly Palomar Airport Advisory Committee. At the October 2017, meeting of the PAAC, a proposal was made to form a sub-committee to review the "Monthly Performance Report." I requested to be a part of this sub-committee and I am now serving on this MPR-subcommittee. One of the main purposes of this committee is to review the slides for the Noise Report, which are prepared by Jessica Turner.

It is through this committee and discussion with members of the "Palomar Airport Advisory Committee," that I learned there are only 2 noise monitors currently installed at Palomar Airport. The minimum recommended for an Airport of this size is, at least, 3 noise monitors. We have been told, there was at one time 3 noise monitors, but the monitor on the North side of the airport was removed some time ago. **How is the County able to show that it's complying with the 1990 Airport Noise Capacity Act (ANCA) when the data they have collected is flawed? From your EIR report the data information is from 2016. Where is the current noise data information?**

I56-1

It was announced at the February 15, 2018, PAAC meeting that 2 additional noise monitors will now be added to Palomar Airport making the total number of 4 noise monitors. **Because your current noise data is flawed in the PMP and EIR will you be updating the data to provide accurate data related to noise abatement?**

I56-2

We are reminded often of the VNAP program for pilots at Palomar Airport. This volunteer noise abatement program can only be effective if there is some sort of consequence for the violators. **What has the County done to inform pilots who violate traffic patterns, which are in place, to reduce noise over residential housing? What sort of contact is made to the pilots? Is this only handled by the FAA? Who is holding the FAA accountable?**

I56-3

I was a private pilot, single engine land, in the 1970's. I flew from Long Beach Airport. I know what an aborted landing looks like. There seems to be more happening at Palomar all the time. These planes swing out over my residential area to get back into the traffic pattern. **Why is the County not keeping track of these instances?** The FAA should have a record of these pattern changes in the Tower Log.

I56-4

I greatly appreciate your response to my questions. I had planned to retire in this community but like Supervisor Bill Horn stated in 2015, if this expansion of operations moves forward, I better move to Fallbrook.

Shirley Anderson
6305 Keeneland Drive
Carlsbad, CA 92009
sander1575@aol.com

RECEIVED

MAR 19 2018

County of San Diego
ENVIRONMENTAL SERVICES

County of San Diego, Attn: Cynthia Curtis
5510 Overland Avenue, Suite 410
San Diego, CA 92123

March 12, 2018

Ref: Traffic Congestion related to the Expansion of McClellan-Palomar Airport

To whom it may concern:

I have been a homeowner in Bressi Ranch since 2010. During that time I have witness the continued development in and around the Palomar Airport Property. Being dismayed by the continued development and approval by the Carlsbad City Council for commercial and residential development in the area, I made a trip to the Public Works Traffic and Mobility office to inquire about the increasing traffic and what is being done for traffic mitigation.

I read through the traffic impact analysis study of 2016, for the City of Carlsbad and discovered that the intersection of most concern is labeled as "Intersection 27" Palomar Airport Road and El Camino Real which currently has a grade of "F".

After my visit to the City of Carlsbad Public Works Office this July 2017, and after speaking with Doug Bilse, City Traffic Engineer, I learned that Intersection 27, has a "FAIL" rating. This was the exact phrase that Mr. Blise stated to me. After attending the recent open information forums regarding the Airport Expansion it was stated, by a County employee, that "this is happening." Referring to the expansion, the wait times to proceed through this intersection are not meeting the city standard. I personally experience the extreme long waits at this intersection and sometimes must wait through 2 green lights to get across El Camino Real.

156-5

There does not seem to be a meeting of the minds when it comes to development and airport expansion with regard to communication between the City of Carlsbad and the County Airport Authority. In the last few years the City has approved large development projects that we are just now beginning to see the traffic impact from. For example, we have the large Robertson Ranch residential development that is just now being occupied on El Camino Real, there is the one million square foot ViaSat office development on Town Garden and El Camino Real that is currently not finished with very large parking structure ready to house 3000 new employees and then there is the new Shea residential development of 125 townhomes and commercial at the corner of Palomar Airport Road and El Fuerte. The Shea development was approved with a zoning change to the Bressi Master Plan that I was adamantly opposed to. This parcel of land was intended for light industrial use but the City of Carlsbad approved the zoning change to allow for the residential development for Shea. These new homeowners will be 3500 feet from touchdown at the East end of McClellan-Palomar Airport.

I grew up next to Long Beach Airport and later lived in Orange County near John Wayne Airport. I have never seen so much residential development put in such close proximity to such a busy airport.

If the San Diego Airport Authority is so invested in expanding the operations at our residential airport why have they not advised our Carlsbad City leaders to act responsibly and not build so much residential property and expose the citizens to all the hazards that come from the increasing changes that are now being proposed? I have watched, recently, the comments of County Supervisor, Bill Horn, who stated that, "if people in Carlsbad do not like it, they should move to Fallbrook because Palomar Airport expansion is coming."

156-6

Why is SANDAG not weighing in on the gridlock that is occurring now in our community? Where is the traffic mitigation report related to the increased traffic caused by airport expansion operations?

156-7

Sincerely,
Shirley Anderson
Carlsbad Resident Homeowner
Sander1575@aol.com
6305 Keeneland Drive
Carlsbad, CA 92009

County of San Diego, Attn: Cynthia Curtis
5510 Overland Avenue, Suite 410
San Diego, CA 92123

March 12, 2018

Ref: Master Plan statement related to Airport Capital Improvement and funding sources.

To whom it may concern:

Section 6 – Airport Capital Improvement Plan

Actual project costs may also vary from initial ACIP estimates as project designs progress and detailed engineering estimates are developed. All airports receiving federal AIP funding are required to update their ACIP with the FAA on an annual basis. **The only update I can find is 2016. Has the County submitted a new ACIP to the FAA? If so, when and where is it? I do not see a mention of costs related to driving pilings over the methane gas, land fill, and what are they?**

FUNDING SOURCES Potential funding sources for any proposed improvements at CRQ come in the form of federal grants, County funds and Airport revenue, and third party investment. The amount of funding available from these sources will depend primarily on future levels of aviation activity at CRQ and future federal funding reauthorizations. As a non-hub primary facility, CRQ is eligible for certain types of funding as described below. **What is the breakdown of Federal Grants, third party investors, and taxpayer money related to the Airport Expansion project? Is there a public disclosure of a list of who the third party investors are? Why have you proposed a tiered phase of Airport improvements, when it is clear that once the project is started, the most financial feasible option would be to immediately complete the runway and taxiway improvements?**

I56-8

Please reference 6.1.1 Federal Grants from the McClellan-Palomar Airport Master Plan Update: FEDERAL GRANTS AIP grants, administered by the FAA, are a critical capital funding source to implement the projects recommended in this Airport Master Plan Update. For the purpose of this Airport Master Plan Update, it is assumed that the AIP will continue to be authorized and appropriated at levels consistent with H.R. 658, the FAA Modernization and Reform Act of 2012. The FAA's National Plan of Integrated Airport Systems (NPIAS) classifies CRQ as a non-hub primary airport. Therefore, the AIP formula stipulates that the Airport Authority is entitled to receive 90 percent federal funding for AIP-eligible projects. AIP funds can be used for most Airport improvement needs, but not operating costs. However, AIP funds are typically not available for revenue-generating projects, so it may be difficult for the Airport Sponsor to use these funds for projects designated to generate revenue. The FAA's AIP consists of entitlement funds and discretionary funds, with entitlement funds being allocated before discretionary funds from the Congressional budget. **Since 2005, CRQ has received approximately \$35.5 million** in federal aid for various projects including pavement rehabilitation, acquisition of necessary equipment, **land acquisition**, terminal improvements, updating the master plan, a wildlife hazard assessment, and security enhancements. There are no open capital improvement projects utilizing federal funding at this time. **Please identify what land acquisition occurred related to the airport since 2005? Where is this land and why was it purchased?**

I56-9

Shirley Anderson
6305 Keeneland Drive
Carlsbad, CA 92009
Sander1575@aol.com

Response to Letter I56**Shirley Anderson**

- I56-1** As discussed in Section 2.4.1 of the PEIR, existing noise contours were produced using the Aviation Environmental Design Tool (AEDT), the FAA's required tool for evaluating noise impacts in the vicinity of airports. Inputs used to produce the contours included detailed flight information gathered in 2016 for January 1 through December 31, 2016, as well as an evaluation of operational data provided by the County's Airport Noise and Operations Monitoring System and FAA's Traffic Flow Management System Counts and Air Traffic Activity System. More information on the noise analysis can be found in Appendix D to the PEIR. Also see **Master Response 4 (Noise Monitors and PEIR Calculations)**.

Regarding the commenter's concern of aircraft noise, County staff researched the location provided by this comment and confirmed the location is outside of the 65dB contour (i.e., less than 65dB) under all scenarios. Specifically, the existing noise condition at the location provided was estimated to be 46.87dB, and its future condition without the Proposed Project is estimated to be 47.69dB. Assuming full implementation of the Proposed Project (PAL 2), the estimated future noise condition would be 49.02dB. This is below the threshold of significance of 65dB CNEL. Although the comment pertains to existing noise conditions, there is no evidence the Proposed Project would result in significant noise impacts. Therefore, because the location would be outside of the 65dB contour, no significant noise impacts would occur, and no changes to the PEIR are required. Please refer to Master Responses 1 and 4 in addition to PEIR Appendix D for more information about the supplemental noise analysis conducted for additional locations.

- I56-2** The noise contours produced for the PEIR were not generated using noise monitors or noise monitoring data at the Airport. As discussed in Section 2.4.1 of the PEIR, existing noise contours surrounding the Airport were produced using the Aviation Environmental Design Tool (AEDT), the FAA's required model for evaluating noise impacts in the vicinity of airports. Inputs used to develop existing conditions noise contours included detailed flight information gathered in 2016 (operational data for January 1–December 31, 2016). This included an evaluation of operational data provided by the County's Airport Noise and Operations Monitoring System and FAA's Traffic Flow Management System Counts and Air Traffic Activity System. Future year noise contours were also produced using AEDT, accounting for forecasted growth in the number of operations for each scenario analyzed along with other variables such as change in aircraft types operating at the Airport. More details on the noise analysis conducted for the PEIR can be found in Appendix D to the PEIR. Also see **Master Response 4 (Noise Monitors and PEIR Calculations)**.
- I56-3** The comment addresses regulatory enforcement of aircraft overflight which is not related to the Master Plan Update or the environmental analysis conducted for the PEIR. As discussed in Section 2.4.1 of the PEIR, the Federal Aviation Administration maintains jurisdiction and regulatory enforcement over aircraft in flight. Accordingly, neither the County nor the City of Carlsbad has the authority to implement mandatory noise abatement procedures at the Airport. No further response is required.
- I56-4** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

- I56-5** The Palomar Airport Road/El Camino Real intersection was comprehensively evaluated in the PEIR and associated Traffic Impact Analysis study under several scenarios, including existing, near-term, and long-term conditions. PEIR Section 2.5.4 does identify that the Proposed Project would result in a cumulative impact under long-term conditions at the intersection of Palomar Airport Road/El Camino Real. As a result, Mitigation Measure M-TR-2 was identified to mitigate the long-term impact. As noted in the PEIR, this mitigation would be implemented in consultation with the City of Carlsbad since it is the local jurisdiction with ownership of the roadway network surrounding the Airport.

Because this comment does not specifically identify an environmental issue with the PEIR analysis, no changes to the PEIR have been made in response to this comment.

- I56-6** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

- I56-7** This comment asks why SANDAG is not discussing traffic congestion within the City of Carlsbad. During public review of the Master Plan Update and PEIR, SANDAG provided a comment letter to the County. The comment letter and the County's responses are provided above under Commenter L2; however, SANDAG's comments do not pertain to traffic volumes or congestion.

The comment also asks what mitigation would occur due to increased traffic volumes caused by the Master Plan Update. Please refer to **Response to Comment I56-5** and PEIR Section 2.5.6 for discussion of the proposed mitigation for cumulative traffic impacts.

- I56-8** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

- I56-9** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

Comment Letter I57

From: Roth, Brian <Brian.Roth@united.com>
Sent: Monday, March 12, 2018 5:51 PM
To: LUEG, PalomarMP
Subject: Positive feedback in support of the proposed Master Plan

I am writing as a resident and citizen of Carlsbad. I am not authorized to represent my employer in this matter, but in full disclosure, I am Regional Sales Director for United Airlines. I moved to Carlsbad 4 year ago and selected my home for a variety of reasons. The quality of life, including the schools, proximity to beach, and transportation were all key factors in our decision to purchase a home in Rancho Carrillo area of Carlsbad. I travel on a regular basis, no, let me restate that, I travel significantly in my role. Access to safe, dependable convenient air service is a significant factor in my quality of life as well as for the many customers we call on in North San Diego and Southern Orange County areas. San Diego International, as well as John Wayne are great airports with significant advantages due to their size, but neither are nearly as convenient as Palomar. When United made the commercial decision to upgrade their service to an all-Jet service offering, I understood the cause, but was personally impacted in a significant way. My door-to-door commute to our offices at LAX went from 1 hour to 2 /12-4 hours, each way.

I know that there is no guarantee that United or any other major carrier would add service if the runway was longer, but I know that the market exists to support service to LAX or SFO or another connecting Hub. The portfolio of corporate accounts I managed was generating well over \$1 million per year from CLD, with a very high percentage of that going to the East Coast or to International markets.

I attended the first open house and listened carefully to all of the information and to the comments from the audience. Unfortunately, most of the comments were in regards to FAA noise policy and curfews. There was not an opportunity to discuss the fact that while private operators can and will do as they please, commercial service is scheduled and significantly less likely to cause the type of disruptions mentioned with middle of the night departures.

In addition to my point of view as a local homeowner, and airline professional, I serve on the Board of Directors for San Diego Business Travel Association. I serve as the Government Relations Director. I would be happy to discuss any of this further, or set up an opportunity to address the SDBTA Board or its membership in support of the Master Plan. Please let me know what I can do to assist, and to ensure that the airport is improved in a way that commercial service can return on a regular basis.

Brian Roth
Regional Sales Director- West

6039 Paseo Alameda
Carlsbad, CA 92009

Tel 720-480-1335 | brian.roth@united.com
united.com

I57-1

Response to Letter I57**Brian Roth**

- I57-1** This comment states support for the Proposed Project. While this comment does not specifically address the adequacy or accuracy of the environmental analysis provided in the PEIR, this comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

Comment Letter I58

From: Carol Smith <carlsbadcarol@att.net>
Sent: Monday, March 12, 2018 7:35 PM
To: LUEG, PalomarMP
Subject: AIRPORT EXPANSION

I HEAR MANY PLANES OVER OR BY MY RESIDENCE. I DO NOT WANT TO HAVE MORE.
CAROL SMITH

] I58-1

Response to Letter I58**Carol Smith**

- I58-1** The County acknowledges the comment; however, it does not raise an issue concerning the analysis of adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

Regarding the commenter's concern of aircraft noise, County staff reviewed this comment for any site-specific location data of the perceived noise. However, the comment does not contain a sufficient location for the County to further study or analyze the noted noise concerns. Although the comment pertains to existing noise conditions, there is no evidence the Proposed Project would result in significant noise impacts. Please refer to Master Responses 1 and 4 in addition to PEIR Appendix D for more information about the supplemental noise analysis conducted for additional locations.

Comment Letter I59

From: Dieter Schulz <dis625@sbcglobal.net>
Sent: Tuesday, March 13, 2018 11:56 AM
To: LUEG, PalomarMP
Subject: Commercial/Public transportation

Since there is no public passenger travel at CLD now, will there be scheduled passenger travel in the future?

I59-1

Sent from [Mail](#) for Windows 10

Response to Letter I59**Dieter Schulz**

- I59-1** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

Comment Letter I60

From: Dee Forsberg, Global Hire <Dee@globalhire.org>
Sent: Wednesday, March 14, 2018 6:48 PM
To: LUEG, PalomarMP
Subject: Airport Expansion

Hello,

My name is Delinda Forsberg, residence 6571 Paseo Del Norte #E Carlsbad, CA 92011. I want to know if any of the existing members of the Carlsbad City City Council own any buildings or properties within a five mile radius of the airport. I also have the same question for the members of the San Diego Airport Authority and Bill Horn.

I60-1

I also want to know whether or not Fed Ex will be able to land planes on the runway if the runway length is expanded. I want to know why the noise monitors at the airports haven't been fully operational and whether or not they are now?

I60-2

Please send your responses to: c/o Pam Watson Delinda Forsberg 3990 Cougar Canyon Road, Hemet CA 92545

Thank you



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Response to Letter I60**Delinda Forsberg**

- I60-1** The commenter requests information regarding the financial interests of elected officials. This type of inquiry is not included in the environmental review of the Master Plan Update nor does it pertain to an issue concerning the analysis of adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I60-2** The ability of an aircraft to use the runway at Palomar as a public-use facility is based on FAA and the pilot's determination of the dimensional requirements of the aircraft. This discussion is found in Section 2.2 of the Master Plan Update. For more information regarding noise monitors in the community please see **Master Response 3 (Voluntary Noise Abatement Procedures)**, and the Airport website at: <https://www.sandiegocounty.gov/content/sdc/dpw/airports/palomar/noiseinfo.html>

Regarding the commenter's concern of aircraft noise, County staff researched the location provided by this comment and confirmed the location is outside of the 65dB contour (i.e., less than 65dB) under all scenarios. Specifically, the existing noise condition at the location provided was estimated to be 50.42dB, and its future condition without the Proposed Project is estimated to be 51.56dB. Assuming full implementation of the Proposed Project (PAL 2), the estimated future noise condition would be 52.66dB. This is below the threshold of significance of 65dB CNEL. Although the comment pertains to existing noise conditions, there is no evidence the Proposed Project would result in significant noise impacts. Therefore, because the location would be outside of the 65dB contour, no significant noise impacts would occur, and no changes to the PEIR are required. Please refer to Master Responses 1 and 4 in addition to PEIR Appendix D for more information about the supplemental noise analysis conducted for additional locations.

Comment Letter I61

From: gober2c@aol.com
Sent: Friday, March 16, 2018 4:11 PM
To: LUEG, PalomarMP
Cc: Brackett, Olivier
Subject: Public Comments - McClellan-Palomar Airport's MPU Draft Program EIR
Attachments: AirportDraftEIRCommentary.pdf

County of San Diego
Attn: Cynthia Curtis
5510 Overland Avenue, Suite 410
San Diego, CA 92123

Dear Ms. Curtis

Attached please find a 10-page letter (in Adobe Reader .pdf format) detailing our public comments to the McClellan-Palomar Airport's MPU Draft Program EIR. Please ensure these comments are properly considered and addressed.

I61-1

Thank you very much for your assistance, and have a nice weekend. Sincerely,

Giovanni and Anne Bertussi

Masters Road, Carlsbad

This message is intended only for the individual or entity to which it is addressed and may contain information that is privileged, confidential or exempt from disclosure under applicable Federal or State law. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by a separate return email and delete and permanently destroy the original message and all copies thereof immediately. Thank you.

GIOVANNI BERTUSSI, JR.
ANNE BERTUSSI
2265 Masters Road
Carlsbad, CA 92008

March 16, 2018

Ms. Cynthia Curtis, Environmental Planning Manager
County of San Diego, Department of Public Works, Airports Division
5510 Overland Avenue, Suite 410
San Diego, CA 92123

**Re: DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT - McCLELLAN-
PALOMAR AIRPORT MASTER PLAN UPDATE - SCH# 2016021105**

Dear Ladies and Gentlemen,

We have reviewed the McClellan Palomar Airport's (the "Airport") Draft Program Environmental Impact Report and related appendices (the "EIR") prepared in connection with its Master Plan Update ("MPU"). After reviewing the EIR, we are very disappointed, **noting numerous significant deficiencies discussed in further detail throughout this letter.** Furthermore, as a result of these significant deficiencies, we do not believe the EIR has been prepared in compliance with the California Environmental Quality Act ("CEQA"). We also do not believe the Airport is currently being operated in accordance with current Federal Aviation Administration ("FAA") airport design standards, significantly negatively impacting unrecognized residential land uses within the Airport's noise impact area.

I61-2

Summarized below are numerous general and specific deficiencies that must be properly considered, evaluated and addressed in the EIR as mandated by CEQA. These general and specific deficiencies are environmentally significant, and they are applicable to the Airport at both the program and project-specific levels.

AIRPORT MASTER PLAN UPDATE EIR REPORT - General Deficiencies

I. Current Updated Airport Operational Information is Not Included, Analyzed and Considered in the EIR

Current updated Airport operational information with significant actual and potential environmental impacts on surrounding land uses is not properly considered and included in the EIR and related technical reports. Instead, outdated inaccurate information has been excessively utilized and relied on in the preparation of the EIR, producing significantly inaccurate and misleading results.

I61-3

The Airport's flight operations and fleet mix have changed dramatically over the past twenty (20) years. Airport Management, County of San Diego staff, and consultants hired to assist the Airport with its Master Plan Update process and EIR should have recognized the need to obtain **and validate** current airport operational information to properly study and analyze current environmental impacts associated with its new 20-Year Master Plan Update. In addition, inquiry and validation testing of potentially outdated and inaccurate Airport operational information to be relied on should have been initiated at Step 1 in the MPU process (the "MPUP"). **This oversight has resulted in the omission of current accurate airport operating information in the EIR, the failure to recognize negatively impacted residential land uses within the Airport's influence area, and the failure to properly prepare the EIR in compliance with CEQA.**

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**Re: DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT - McCLELLAN-
PALOMAR AIRPORT MASTER PLAN UPDATE - SCH# 2016021105**

AIRPORT MASTER PLAN UPDATE EIR REPORT - General Deficiencies (Continued)

I. Current Updated Airport Operational Information is Not Included, Analyzed and Considered in the EIR (Continued)

The outdated and inaccurate Airport operating information included in the Airport's preliminary draft EIR is misleading, and it does not properly document the Airport's current operating environment, and associated flight related conditions and impacts. As a result, numerous significant environmental impacts and effects associated with the implementation of the Airport's Master Plan Update and related improvement projects have not been properly recognized and considered as required by CEQA.

Finally, current accurate airport operational information is also essential to obtain informed public input throughout the update process, to enable elected officials to make proper decisions, and to properly evaluate the reasonable usage of taxpayer funds.

I61-3
cont.

II. Public Comments Submitted in Response to the Notice of Preparation/Initial Study (281 Pages) Were Not Properly Considered and Evaluated in the EIR

The EIR Report does not include a comprehensive professional review of potential environmental impacts associated with the Airport's Master Plan Update. For example, the EIR Report does not properly consider, evaluate and address the two hundred and eighty one pages (281) of timely preliminary written public comments submitted and received by the Airport in connection with its Notice of Preparation/Initial Study "NOP/IS" (see Appendix A - NOP/IS, pages 59 through 340). These public comments are almost completely ignored in the EIR.

Almost every public comment received includes references to significant potential environmental impacts and requests for consideration that are not properly considered and addressed in the EIR, as required by CEQA. Many of these potential impacts and requests for consideration were ignored by the Airport, and improperly omitted from the EIR, and many were improperly considered and addressed in the EIR. As a result, many significant environmental impacts (including noise and air quality impacts and related considerations, among other impacts) were only addressed by the Airport for proposed MPU construction activities, and not for Airport flight and related operational activities, among other matters.

I61-4

III. Current Accurate Airport Operational Information Was Disregarded in the MPU Process Resulting in Biased Airport Preliminary Decision Making and EIR Impact Evaluation

The EIR's "Project Synopsis (Section S.1)" notes a primary purpose of the MPU is to evaluate proposed improvements and base their constructability on their ability to meet technical, **economic** and environmental considerations. The Public was not informed of accurate planned Airport projections resulting from its MPUP for proposed C-III and D-III aircraft operations (i.e. departures and arrivals) until recent EIR Report public meetings held in February 2018. The Airport is only projecting approximately 1,500 total future operations each year from both classes of these aircraft combined (approximately 4 per day).

I61-5

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**Re: DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT - McCLELLAN-
PALOMAR AIRPORT MASTER PLAN UPDATE - SCH# 2016021105**

AIRPORT MASTER PLAN UPDATE EIR REPORT - General Deficiencies (Continued)

**III. Current Accurate Airport Operational Information Was Disregarded in the MPU Process
Resulting in Biased Airport Preliminary Decision Making and EIR Impact Evaluation (Continued)**

Why is the Airport planning to spend significant taxpayer funds pursuing a financially irresponsible Airport improvement alternative to accommodate these aircraft (the preferred "Modified C/D-III Alternative")? **Projected Airport operations for C-III and D-III aircraft are extremely minimal.** Furthermore, **the minimal future Airport operational projections for these aircraft (i.e. departures and arrivals) do not support spending millions of taxpayer dollars to accommodate them.** The evaluation of planned Airport improvement alternatives appears biased, and this alternative is not in the public's best interest.

Moreover, County Airport staff did not identify this negative cost-benefit relationship in Step 1 of the MPU process, and advise the public and its elected officials accordingly. With proper preliminary disclosure of this important public information, along with the opportunity for related public discussion and debate, elected officials would presumably have directed Airport staff to pursue a different MPU improvement alternative. **The only improvement alternative that meets financial and economic requirements for future Airport development based on the Airport's ability to meet existing and future aviation demand in a cost-effective manner is the Airport's B-II Enhanced Alternative for improvements.**

Finally, the EIR appears conclude an accommodation for these aircraft is required by the Airport. However, an accommodation is not required. This is another biased misrepresentation. FAA safety requirements and design standards are only dictated by the most demanding aircraft (having over 500 annual itinerant operations at the Airport (i.e. C-III and D-III aircraft)) **if it makes economical sense for an airport to choose to construct improvements for these aircraft in the first place.** In this case, it clearly does not make economical sense to fund improvements for these aircraft. Accordingly, the preliminary selection of the preferred "Modified C/D-III Alternative" by the Airport is biased, and not in the public's best interest. The only proposed MPU improvement alternative that meets the economic requirements of the MPUP without bias is the Airport's B-II Enhanced Alternative.

**IV. County Management's Excessive Involvement Preparing the EIR Resulted in Airport Bias and a
Lack of Independence in the EIR's Content and Conclusions**

The preceding sections of this letter describe various EIR deficiencies resulting from inaccurate, omitted and improperly considered and evaluated Airport operational information and processes. Similarly, excessive involvement by County staff preparing and directing the preparation of the Airport's MPU and EIR appears to have contributed to EIR deficiencies, particularly considering the apparent Airport bias towards achieving Airport objectives without properly considering potential reported environmental impacts affecting the public.

We understand County management has drafted most of the Airport's EIR using the information previously referenced, and has also significantly influenced and directed the preparation of the EIR throughout the MPUP, resulting in a lack of independence, and contributing to the general deficiencies previously noted. Specific deficiencies noted in the Airport's EIR that are directly related to the general deficiencies previously described follow.

I61-5
cont.

I61-6

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**Re: DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT - McCLELLAN-
PALOMAR AIRPORT MASTER PLAN UPDATE - SCH# 2016021105**

AIRPORT MASTER PLAN UPDATE EIR REPORT Specific Deficiencies

1) The Description of the Airport's Environmental Setting in the EIR is Not Accurate

The Airport has failed to recognize and provide an accurate description of existing environmental conditions in the vicinity of the Airport. As a result, significant potential environmental impacts have been overlooked, and not properly considered and addressed in the EIR, as required by CEQA.

Determining and documenting an accurate description of existing physical environmental conditions in the vicinity of the Airport is essential for determining significant program and project related environmental impacts of the Airport's MPU projects, and for complying with CEQA. The Airport's description of surrounding land uses is not accurate. **As a result, significant potential impacts to numerous residential communities in the Airport's impact area that will be impacted by the Airports MPU are not considered in the EIR.** Two hundred and eighty one pages (281) of public comments submitted to the Airport (in connection with its NOP/IS) are from residents of these communities, and the public comments were primarily disregarded by the Airport, and were not properly recognized, considered and addressed in the EIR (see Appendix A - NOP/IS, pages 59 through 340, for public comments received).

I61-7

2) The Summary of Significant Effects and Mitigation Measures that Reduce or Avoid Significant Effects (Table S-2) is Incomplete, and Does Not Include Aircraft Flight Related Impacts

The summary of significant effects and mitigation measures summarized in Table S-2 to the EIR is incomplete. The table fails to recognize and address many important significant public comments received, and it misrepresents other potentially significant environmental effects and necessary mitigation measures and related conclusions (see Appendix A - NOP/IS, pages 59 through 340). Furthermore, technical studies performed and related underlying data is incomplete.

For example, the "Noise" impact section of Table S-2 in the EIR **only addresses construction noise** associated with the MPU's improvement projects. The EIR **does not address any important potential Airport MPU flight noise and air quality impacts to surrounding residential communities** from new planned aircraft operations, extended runways, relocated runways, etc. Air quality and related environmental considerations from aircraft fumes and engine solvents being released from thousands of small aircraft operations annually has also not been considered.

I61-8

Required mitigation measures will also need to be considered and developed to address the preceding omitted matters. The negative impacts from these matters are already significant, and the planned MPU projects will increase the significance of these impacts to residents nearby.

3) The Areas of Controversy Section of the EIR is Not in Compliance with CEQA (Section S.3)

The Areas of Controversy section of the EIR is incomplete and biased. Simply referring to the Airport's NOP and public comments received does not satisfy the requirements of CEQA. This section of the EIR does not meaningfully identify, describe or address any specific areas or issues of public controversy known to, or communicated to, the Airport, as required by CEQA. Instead, the EIR

I61-9

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only refers to the aggregate public communications received, minimizes the significance of the communications, and **does not properly and directly consider and address the 281 pages of important public content and concerns communicated.**

I61-9
 cont.

4) The Financially Feasible Objective of Preferred Alternative Modified C/D-III Is Not Addressed

The financial feasibility objective of the Airport's preferred Modified C/D-III alternative is not properly addressed in the EIR. This preferred alternative does not appear to be financially responsible as discussed in General Deficiency III, its future financial implications have not been disclosed to the public, and its near and long-term needs have not been addressed in a manner demonstrating this alternative is financially responsible, financially achievable, and operationally sustainable. Accordingly, it does not appear the preferred alternative is financially reasonable, or should be eligible for FAA grant funding.

I61-10

5) Chapter 1 – Significant Project Description, Location and Environmental Setting Inaccuracies

In Chapter 1 of the EIR, **the Airport improperly asserts the County has no authority over the quantity, type, or flight track of an aircraft arriving or departing from the airport attempting to limit its CEQA impact analysis responsibilities, and related mitigation matter considerations.** Accordingly, the Airport has not analyzed the potential environmental impacts associated with its aircraft flight operations, and it appears to be using this inaccurate assertion to justify this significant omission.

This assertion directly contradicts the Airport's Noise Program outline presented to the general public in February 2018, acknowledging the Airport can implement a voluntary noise abatement program establishing "Where and when pilots should fly". In addition, the Airport is subject to a FAR Part 150 Noise Compatibility Program ("NCP") Agreement that was reviewed and approved by the FAA in December 2006. The Airport's NCP is developed by the Airport, not the FAA, and submitted to the FAA for approval. It includes recommendations regarding its noise abatement operational measures (10), land use planning/management elements (6), and program management measures (16).

I61-11

Furthermore, the Airport's NCP is a local program, and not a Federal program. **Accordingly, Airport management is responsible for addressing and implementing the Airport's approved NCP recommendations (not the FAA), and it is responsible for doing so. The Airport is also not currently in compliance with many of its own noise abatement recommendations, severely negatively impacting neighboring residential communities.** The Airport also incorrectly implies flight tracks are the sole jurisdiction of the FAA. The Airport does have authority regarding the flight track of an aircraft when matters regarding its Noise Compatibility Program ("NCP") with the FAA are involved, and the Airport needs to recognize its NCP responsibilities to the community.

The FAA does not substitute its judgment for that of the Airport with respect to which NCP measures should be recommended for action, and the FAA's approval of the Airport's recommendations in the NCP is also limited to certain determinations. Subsequent decisions or a request for Federal action to implement specific noise compatibility measures may also be required, and may require an environmental assessment, other procedures or requirements, provided the FAA is made aware of the matter by the Airport.

Upon review, the Airport's current NCP with the FAA was also found to include many deficiencies found during review of the EIR, presumably for similar reasons. Please see the following section for additional

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information concerning the Airport's NCP noncompliance, and related EIR impacts requiring further consideration.

The Airport's description of surrounding land uses in the environmental setting section of the EIR is also inaccurate and incomplete, and it does not provide a proper baseline condition to compare MPU project impacts in compliance with CEQA (see Section 1.4.2). The description of residential land uses in the vicinity of the Airport omits many nearby residential land uses that should be included and considered for impacts (e.g. Evans Point, Eagles Canyon, Camino Hills Estates, Heron Bay, Spyglass Hills, etc., etc.).

I61-11
cont.

6) The Project Objectives Section (1.1) of the EIR Implies an Airport Requirement to Accommodate C-III and D-III Aircraft Although Minimal Forecasted Operations Does Not Justify This Alternative

The Airport's initial review of its future forecasted aircraft fleet mix should have ruled out any desired and required improvements for C-III and D-III aircraft because their minimal forecasted operations do not satisfy the financial feasibility objective required for accommodation. Furthermore, the minimal annual forecasted itinerant operations projected for these aircraft, along with the negative financial considerations discussed in General Deficiency III, do not justify the very expensive improvements required to accommodate them.

I61-12

7) The Project Description Section (1.2) of the EIR Requires Revision for a New Preferred MPU Alternative When it is Ultimately Recognized By the County Board of Supervisors

The public relies on its elected officials to recognize financially irresponsible programs and projects proposed and supported by public employees compensated with taxpayer funds. Our elected officials must recognize the need for revised decisions based on accurate information and data being provided.

I61-13

8) Environmental Impacts and Necessary Mitigation Associated with the Proposed Relocation and Extension of Runway 06-24 on Multiple Impacted Residential Communities Must Be Considered

Consistent with item 2), the EIR does not properly consider and address important potential flight noise and air quality impacts to surrounding residential communities from relocating and extending runway 06-24, as required by CEQA. Related air quality and related environmental considerations from aircraft fumes and engine solvents being released must also be considered. Once again, the Airport has completely disregarded, or not properly addressed, the important concerns, information and potentially significant environmental impacts previously communicated in 281 pages of public comments received relating to these matters. The Airport is also aware of more than 227 pages of additional public comments received from 3 public meetings held in connection with the preparation of its 2006 Part 150 Noise Compatibility Program Agreement with the FAA (the "NCP") that relate to these matters and must be considered and addressed as required by CEQA.

I61-14

Surrounding **residential neighborhoods (with hundreds of homes immediately north of the Airport) are significantly negatively impacted by pilots operating loud piston-propeller small aircraft who regularly and continuously disregard the Airport's current recommended air traffic pattern altitudes, voluntary noise abatement procedures and programs (VNAPs), recommended departure tracks and procedures, and aircraft training policies and procedures without consequence.** These residential neighborhoods will be negatively impacted even further by the Airport's runway relocation and extension plans.

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9) Public Comments Submitted in Response to the Notice of Preparation/Initial Study (281 Pages) Were Not Properly Considered and Evaluated in the EIR

Section 1.6.1 of the EIR, "Notice of Preparation", simply refers to a copy of the Notice of Preparation and public comments **with no further discussion or consideration of the large volume of significant important public comments received**. See the discussion of general deficiencies above, section II, for a further discussion of related matters and issues affecting the EIR.

I61-15

10) The EIR Has Not Been Prepared in Compliance with Section 15151 of the CEQA Guidelines

The EIR has **not been prepared in compliance with CEQA guidelines**. As communicated previously and hereafter, the EIR has many significant deficiencies, and therefore has not been prepared with a sufficient degree of **proper** analysis to provide decision makers **accurate** information enabling them to make decisions that intelligibly take account of environmental consequences of the Airport's MPU projects. Currently, the Airport's EIR is **inadequate, incomplete, and it significantly lacks a good faith effort at full disclosure** of potential environmental impacts and considerations.

I61-16

OTHER SIGNIFICANT RELATED MATTERS IMPACTING THE AIRPORT'S EIR

I. The Airport's Noise Impact Technical Report (the "Noise Report" - See NOP/IS Appendix D) Was Not Prepared Using Accurate Assumptions, Sufficient Parameters, Accurate and Complete Information and Data, and Properly Considering Important Public Comments Received

The Airport's Noise Impact Technical Report was prepared using **inaccurate assumptions, insufficient parameters, and inaccurate and incomplete information and data**. As a result, the Noise Report does not accurately describe and assess current and forecasted long-term noise conditions and potential aircraft noise impacts associated with the Airport' MPUP.

1) Preparers of the Airport's Noise Report improperly and excessively relied on the Airport's outdated and inaccurate Part 150 Noise Compatibility Program Agreement (including related noise exposure maps and other information) to prepare their report.

I61-17

Other inaccurate Airport operational information (discussed below) was also improperly relied on without being properly tested and validated. Moreover, hundreds of pages of important public comments received in connection with the Airport's NOP/IS and FAR Part 150 Noise Compatibility Program (NCP) Agreement were not properly considered and utilized.

As a result, the Airport and its consultants continue to perpetuate an inaccurate and incomplete environmental assessment of significant noise and hazardous materials impacts affecting residential and other land uses in the vicinity of the Airport. For example, the responsible parties have improperly determined the closest and only impacted noise sensitive residential land use is Bressi Ranch, a residential development located southeast of the Airport. This assertion is unfounded, and it is contradicted by a thorough reading of the hundreds of pages of public comments received from the residents residing within the Airport's northern noise influence area. In fact, the noise sensitive residential land uses most significantly impacted by the Airport's flight operations are those **unrecognized residential developments** immediately north of the airport within 1 to 2 miles of the departure point of runway 06-24 (e.g. Evans Point and numerous other adjacent residential developments).

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The residential developments immediately north of the Airport are the most significantly impacted land uses because they receive the “full noise impact” from all Piston-Propeller and other aircraft departing the Airport using runway 06-24. Furthermore, Piston-Propeller aircraft using this runway require full engine power during their ascent, and immediately turn hard right, proceeding directly over these northern neighborhoods. The cumulative noise levels from these Piston-Propeller aircraft are also significant because these aircraft are loud and slow, and they can be heard departing the Airport, and coming and going from miles around. These operations also include significant touch-and-go operations referred to in the Airport’s NITR.

I61-17
cont.

Many of these residential developments were built in the 1990s, but the Airport failed to properly recognize them as significantly impacted noise land uses during 2003-2006 when its Part 150 Noise Compatibility Program (NCP) Agreement with the FAA was prepared and updated (see also discussion of additional Part 150 Noise Compatibility Program information following this section).

2) Preparers of the Airport’s Noise Report did not properly test and validate the outdated Airport noise contours used to prepare their report.

Outdated Airport noise contour information has been improperly carried forward for years from one noise report to another without proper validation testing being performed, and without necessary updates being recognized and proposed. Although an evaluation of certain data was purported to have been performed, the results of the Noise Report do not support a thorough evaluation with related sufficient testing and proper validation of underlying data.

For example, sufficient significant aircraft noise information produced by the Airport’s two remaining noise monitoring stations (and its related Noise and Operations Monitoring System software (“ANOMS”)) was not obtained and utilized by the preparers of the Airport’s noise reports. This fact is troubling, and it was acknowledged by the Airport during its February 2018 public EIR meeting. Moreover, noise program presentation materials from the meeting clearly state, “New Master Plan noise analysis and noise contours were not developed from the two remaining noise monitoring stations”.

I61-18

The Airport is aware that current proper Airport noise contours should encompass the entire touch-and-go patterns of Piston-Propeller aircraft. The Airport receives hundreds of complaints each year relating to these operations. In addition, these aircraft currently completely disregard the Airport’s VNAPs, and regularly fly low patterns over the many impacted residential land uses that have not been properly recognized to date. Moreover, Piston-Propeller aircraft are loud, slow, low-flying, and they produce CNEL readings at or above 65 CNEL throughout their touch-and-go their flight routes over these residential land uses. Based on Table 2 of the Noise Report, these Piston-Propeller aircraft also generate 108,133 operations per year, or approximately 300 operations per day. Proper Airport noise contours should also include tested and validated B-II jet and multi-propeller aircraft departure and arrival corridors, as specified by the FAA.

3) Preparers of the Airport’s Noise Report did not properly test and validate the outdated Airport CNEL Information used to prepare their report.

Similar to the deficiencies noted above regarding the improper testing and validation the Airport’s outdated noise contours, the preparers of the Airport’s Noise Report improperly relied on outdated and inaccurate Airport Community Noise Equivalent Level (“CNEL”) information to derive current important CNEL information for their report. Moreover, they did not properly test, validate and determine proper accurate current CNEL information, measurements and areas necessary for compliance with CEQA.

I61-19

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The Airport's two functioning noise monitoring systems collect the most meaningful noise data and information available to quantify noise problems and matters in surrounding neighborhoods, but the noise analysis, noise contours and CNELs were not developed considering this very important and significant data and information. The Airport is also supposed to have four functioning noise systems operating and producing ANOMS information strategically located around the Airport in known aircraft flight paths suspected to be within CNEL 60 noise contours, but it still only has two functioning systems.

The Airport's consultants should understand meaningful CNEL aircraft noise data and information can only be collected directly from specialized noise monitoring equipment. Furthermore, they should have access to portable noise monitoring equipment to properly test, determine and validate critical Airport noise contour and CNEL information.

The Airport's ANOMS system produces multiple noise reports for noise events. These reports include single noise event measurements (e.g. SEL(dB), LMax(dB)) exceeding CNEL(65dB) produced by the two functioning Airport noise monitoring stations from which CNEL(dB) measurements can be validated. There were over 500 single noise events **exceeding 65dB** in January 2018, and over 430 single noise events **exceeding 65dB** in February 2018. Additionally, an ANOMS report providing "Average Aircraft Noise Levels" supports the assertion that the "Mean SEL" and "Max SEL" readings for Piston-Propeller aircraft are very closely comparable with larger aircraft. Moreover, the number of touch-and-go operations is also very high supporting the need for revised Airport noise contours encompassing the entire touch-and-go patterns of Piston-Propeller aircraft currently using the Airport.

II. The Airport's Current FAR Part 150 Noise Compatibility Program (NCP) Agreement with the FAA Was Prepared Using Outdated Information and Data, and Important Public Comments Were Not Considered

The Airport's FAR Part 150 Noise Compatibility Program (NCP) Agreement with the FAA was prepared using outdated and inaccurate information and data, and important public comments submitted were not properly considered and addressed in the NCP. In addition, the NCP contains significant inaccuracies from outdated information being carried forward from prior years that was not properly validated, corrected and revised when the NCP was prepared in 2006. Over 227 pages of public comments and concerns previously received by the Airport were also not properly recognized, considered and included in the NCP. As a result, the NCP does not properly address many important noise impacts and recommendations that should have been addressed previously.

For example, the NCP fails to report accurate information regarding neighboring residential communities surrounding the Airport that were significantly negatively impacted by Airport noise at the time it was prepared (particularly by loud low-flying piston-prop aircraft performing touch-and-go operations and flying directly over these existing communities). Other significant inaccurate information in the NCP includes maps, figures and tables carried forward from before 1995. Similarly, most of this information in the NCP appears to have been simply carried forward from the Airport's previous 1992 NCP without proper correction and revision, and without considering new potential Airport environmental impacts.

Significant Airport noise impacts to numerous existing residential neighborhood communities north of the Airport, and within the immediate vicinity of the Airport, were also simply omitted from being considered at all. Accordingly, accurate Airport operational information was not properly included and considered in the NCP, and communicated to the FAA for approval.

I61-19
cont.

I61-20

March 16, 2018
Ms. Cynthia Curtis, Environmental Planning Manager
County of San Diego, Department of Public Works, Airports Division
Page 10 of 10

Existing noise abatement measures and voluntary noise abatement procedures (VNAP) that should have been considered and revised with FAA assistance and guidance were also not addressed. These include revised and updated air traffic patterns and altitudes, voluntary noise abatement procedures and programs (VNAPs), aircraft training policies and procedures, and departure track and procedure revisions.

Title 14, Code of Federal Regulations, Part 150, Noise Compatibility Planning, was not complied with. As a result, meaningful and effective airport operator noise compatibility recommendations were not communicated to the FAA for consideration and approval, and the Airport's current noise abatement programs and procedures are completely ineffective.

The Airport's current FAR Part 150 Noise Compatibility Program Agreement with the FAA should be comprehensively updated before the current Master Plan Update Process is completed to ensure all potential environmental impacts associated with the Airport's Master Plan Update are properly considered in accordance with CEQA. The current NCP is also over eleven (11) years old, and a new NCP is needed to recognize and mitigate significant environmental concerns and considerations previously communicated to the Airport by the general public that have never been properly recognized and addressed.

Please properly consider and address these public comments to the Airport's Draft Program Environmental Impact Report as CEQA requires. Thank you for your assistance. Sincerely,

Giovanni and Anne Bertussi

cc:

Mr. Mark McClardy, Manager
Federal Aviation Administration
Airports Division, Western Pacific Region

Mr. Olivier Brackett
Airport Manager
McClellan-Palomar Airport

Clerk of the Board of Supervisors
San Diego County

I61-20
cont.

I61-21

Response to Letter I61
Giovanni and Anne Bertussi

- I61-1** The County acknowledges these introductory comments; however, they do not present specific information regarding an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I61-2** The County acknowledges these introductory comments; however, they do not present specific information regarding an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I61-3** Please refer to **Master Response 6 (Existing Airport Activity)**.
- I61-4** In accordance with Section 15082 of the CEQA Guidelines, the lead agency is not required to prepare formal responses to comments received during the public comment period during the Notice of Preparation process. In addition, Section 15082 of the CEQA Guidelines only requires that input from responsible and trustee agencies pertaining to the scope and content of the environmental information related to its jurisdiction must be included in an EIR. Furthermore, in accordance with Section 15083 of the CEQA Guidelines, the lead agency may conduct early public consultation with parties other than responsible or trustee agencies but is not required to. Therefore, the analysis within the PEIR is adequate, and no revisions to the PEIR have been made in response to this comment.
- Regarding future aircraft operations, the PEIR did identify, calculate, and disclose various environmental conditions resulting from future aircraft operations, including air quality, greenhouse gas emissions, and noise.
- I61-5** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I61-6** The comment includes summary remarks regarding the PEIR's perceived deficiencies. The County acknowledges the comments; however, they do not raise a specific issue concerning the analysis of adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I61-7** Please refer to **Master Response 6 (Existing Airport Activity)**.
- I61-8** The comment states that PEIR Table S-2 is missing a discussion of air quality. Table S-2 is a summary of potentially significant impacts and their associated mitigation measures. As discussed in the PEIR, air quality impacts would be less than significant and no mitigation measures are required. Therefore, it would not be included in Table S-2. Please see PEIR Section 3.1.2 for a complete analysis of air quality.

The comment also states that no noise impacts are identified resulting from aircraft. As discussed and analyzed in the PEIR Section 2.4.2.1, the Proposed Project would result in less than significant noise impacts from aircraft. Therefore, it would not be included in Table S-2. Please see PEIR Section 2.3.2.1 for a complete analysis.

Regarding the commenter's concern of aircraft noise, County staff researched the location provided by this comment and confirmed the location is outside of the 65dB contour (i.e., less than 65dB) under all scenarios. Specifically, the existing noise condition at the location provided was estimated to be 50.48dB, and its future condition without the Proposed Project is estimated to be 50.72dB. Assuming full implementation of the Proposed Project (PAL 2), the estimated future noise condition would be 51.77dB. This is below the threshold of significance of 65dB CNEL. Although the comment pertains to existing noise conditions, there is no evidence the Proposed Project would result in significant noise impacts. Therefore, because the location would be outside of the 65dB contour, no significant noise impacts would occur, and no changes to the PEIR are required. Please refer to Master Responses 1 and 4 in addition to PEIR Appendix D for more information about the supplemental noise analysis conducted for additional locations.

- 161-9** In accordance with Section 15123 of the CEQA Guidelines, an EIR shall contain a brief summary of areas of controversy known to the lead agency, including issues raised by agencies and the public. Section S.3, Areas of Controversy, of the PEIR refers a reader to Appendix A, which includes all of the comments received during the NOP comment period. Therefore, the PEIR adequately stated the areas of controversy and no revisions have been made to the PEIR in response to this comment.
- 161-10** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- 161-11** Please refer to **Master Response 7 (FAA Involvement and Oversight)**.
- 161-12** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- 161-13** The County acknowledges the comments; however, they do not raise an issue concerning the analysis of adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- 161-14** The commenter states that the PEIR does not properly consider and address important potential flight noise and air quality impacts. Regarding concerns of aircraft noise, please refer to **Response to Comment 161-8** above. The PEIR used a full year's data using actual flight tracks, elevations, and aircraft types in the methodology used for evaluating the Proposed Project's potential effects to noise and air quality. See PEIR Section 2.4 Noise and Section 3.1.2 Air Quality, and their associated technical studies.

The additional comments described by the commenter are not related to the Master Plan Update or the PEIR. CEQA does not require a lead agency to respond to comments received on unrelated projects as a part of the analysis.

Please also refer to **Response to Comment I61-8** regarding air quality.

I61-15 Please refer to the **Response to Comment I61-4** above.

I61-16 Please refer to **Master Response 10 (Program-level vs. Project-level Review)**.

I61-17 The commenter states that the noise analysis conducted for the PEIR relied upon noise measurements taken as part of the Airport's Part 150 Noise Compatibility Program (NCP). The County disagrees with this statement. While ambient noise measurements were taken as part of the construction noise analysis, this data is unrelated to the noise monitoring conducted as part of the Part 150 Noise Compatibility Program and was not used in preparation of the aircraft noise analysis. Also see **Master Response 4 (Noise Monitors and PEIR Calculations)**.

As discussed in Section 2.4.1 of the PEIR, existing noise contours surrounding the Airport were produced using the Aviation Environmental Design Tool (AEDT), the FAA's required model for evaluating noise impacts in the vicinity of airports. Inputs used to develop existing conditions noise contours included detailed flight information gathered in 2016 (operational data for January 1–December 31, 2016). This included an evaluation of operational data provided by the County's Airport Noise and Operations Monitoring System and FAA's Traffic Flow Management System Counts and Air Traffic Activity System. Future year noise contours were also produced using AEDT, accounting for forecasted growth in the number of operations for each scenario analyzed along with other variables such as change in aircraft types operating at the Airport. More details on the noise analysis conducted for the PEIR can be found in Appendix D to the PEIR.

I61-18 Please refer to **Response to Comment I61-17** and **Master Response 4 (Noise Monitors and PEIR Calculations)**.

I61-19 The data obtained from the ANOMS system and used in the aircraft noise analysis pertained to operational information only. Noise measurements taken by the noise monitors were not used in the preparation of the noise contours included in the noise analysis in the PEIR. Please see Section 1.2.2 of Appendix D to the PEIR. Please also see **Response to Comment I61-17**.

I61-20 The comment pertains to the Airport's Part 150 Noise Compatibility Program. The commenter states that FAR Part 150 Noise Compatibility Program Agreement with the FAA should be comprehensively updated before the current Master Plan Update Process is completed. The comment is noted; however, as the comment does not provide evidence of an error nor evidence of a new significant effect related to the PEIR, no further response is warranted.

I61-21 These are conclusion comments. They do not raise specific issues regarding the content of the PEIR, but will be included as part of the administrative record and made available to the decision makers prior to a final decision on the Proposed Project.

Comment Letter I62

From: jhull08293@roadrunner.com
Sent: Friday, March 16, 2018 3:08 PM
To: LUEG, PalomarMP
Attachments: Carlsbad Airport Letter March 16, 2018.pdf

Please find attached our comments for on the DEIR for the Palomar Airport project.

Thank you,

Joe and Mary Hull

Return notification requested

I62-1



**MARY & JOE HULL
913 POPPY LANE
CARLSBAD, CA 92011**

County of San Diego
Department of Public Works
5510 Overland Avenue, Suite 410
San Diego, CA 92123
Attn: Cynthia Curtis

Via E-mail: PalomarMP@sdcounty.ca.gov

Re: Draft EIR for the McClellan-Palomar Airport Expansion Project

Ms. Curtis:

Please accept our comments for the DEIR for the Master Plan update for the McClellan-Palomar Airport (Airport). Based on our review of the DEIR, it fails to adequately establish a purpose and need for the project and does not quantify or address the actual impacts of the project, particularly for the proposed extension of the existing runway.

Having lived in the Spinnaker Hills neighborhood for over 25 years, we are well aware of the complete failure of the current "Fly Friendly" rules (FFR) the voluntary program related to Airport use, noise levels and recommended timeframes of usage. The current FFR system along with the proposed extension is analogous to having a voluntary, unenforceable, speed limit on a roadway and then widening the road to reduce noise and improve safety.

To demonstrate the complete lack of control I have added a few photos from last Saturday March 10th, as I worked in the backyard. I could have literally taken photos all day long and I counted as many as 6 airplanes in a single hour that flew over the houses on our street and continued over the Aviara development to the south. In addition, just today alone (March 16th), based on web tracker information, there were 45 operations prior to 5:00a.m. This flight pattern that is routinely used is shown on the attached map.

The DEIR's stated purpose is to reduce noise for communities to the west by extending the runway and improve safety. However, both of these statements are erroneous given the fact that the airport currently operates under the concept of the FFR since there are no limits as to when flights can depart or return to the airport and the path they take. So, adding or inducing additional travel demand will decrease overall safety and increase the potential for conflict.

March 16, 2018

I62-1
cont.

**MARY & JOE HULL
913 POPPY LANE
CARLSBAD, CA 92011**

Should the runway be made longer, only heavier laden jets will need to use the added length, and a longer runway does not mean other air traffic will utilize any extra length that might be available nor continue on the required flight path out to the Pacific Ocean. So, there is no way to actually know what the true noise impacts or the effect of a longer runway will be. In addition, there really isn't any neighborhoods directly west of the airport (depicted by the orange colored areas on the attached map). In contrast, the expansion will allow aircraft with additional fuel capacity to use the runway that currently cannot, and the direct noise impacts and overall noise will be greatly increased.

Since, the DEIR does not have any actual counts and very minimal measurements of existing noise levels for aircraft that do not stay within the FFR recommended flight patterns or operate outside of the flight time windows, the DEIR is totally deficient in this area.

In addition to the lack of information in the noise impact analysis, the traffic impact study needs substantial revisions. Some of the existing traffic volumes were counted on a single day, June 21, 2017. This is not an appropriate method to establish the existing traffic volume data. All of the intersections analyzed in the traffic study should follow the same methodology and specifically the intersections should be analyzed using the 2010 Highway Capacity Manual for both existing and future conditions. Although some fair share mitigation is proposed, the traffic study did not identify direct impacts at the signalized entrance at Yarrow Drive. As Carlsbad residents, it must be an oversight to conclude that the intersection would not need some sort of capacity improvement at the existing intersection, which has a short left turn lane for eastbound traffic and a right turn lane for traffic entering from the west.

Another key area that is lacking in the DEIR is an air quality analysis that covers both the GHG impacts for the increase fuel usage for air traffic but, also for vehicular traffic that will use the new expanded Airport facility. This GHG increase is inconsistent with the County's Climate Action Plan and the DEIR needs to address the mitigation measures needed to reduce the GHG effects.

There is no way to quantify the number of new or induced flights based on the extension of the runway. The potential impact categories previously mentioned including noise, traffic, and air quality need to be analyzed with a maximum usage scenario and not based on a purely speculative or hypothetical minimal grow rate that is used in the DEIR. All the associated impacts need to be mitigated so the proposed project will not have far reaching, severe, and significant impacts to the City of Carlsbad and surrounding area.

March 16, 2018

I62-1
cont.

**MARY & JOE HULL
913 POPPY LANE
CARLSBAD, CA 92011**

As covered in the 2013 feasibility study for the Master Plan update, most of the proposed “need” for the project is to accommodate private services, flight schools, cooperate jets and other private aircraft. Thus, the proposed project provides, at best, little or no public benefit and is why we adamantly oppose any project to extend the existing runway, particularly with an estimated price tag of \$100 - 125 million dollars.

In summary, the DEIR is inadequate and does not support the project and violates the California State Aeronautics Act (CSAA). We believe that any lengthening of the existing runway without FAA restrictions will create traffic impacts, noise impacts and air quality impacts that are not properly presented or analyzed in the DEIR, because there are not any regulations or enforcement for the utilization of the Airport. Any project that increases utilization will in turn increase the likelihood of a mishap and decrease the safety of the Airport and the surrounding neighborhoods and would be in violation of the CSAA by creating new noise and safety impacts.

Respectfully,

Mary Hull
Joseph Hull
913 Poppy Lane
Carlsbad, CA 92011
jhull08293@roadrunner.com
(760) 438-2719 Home

Attachments

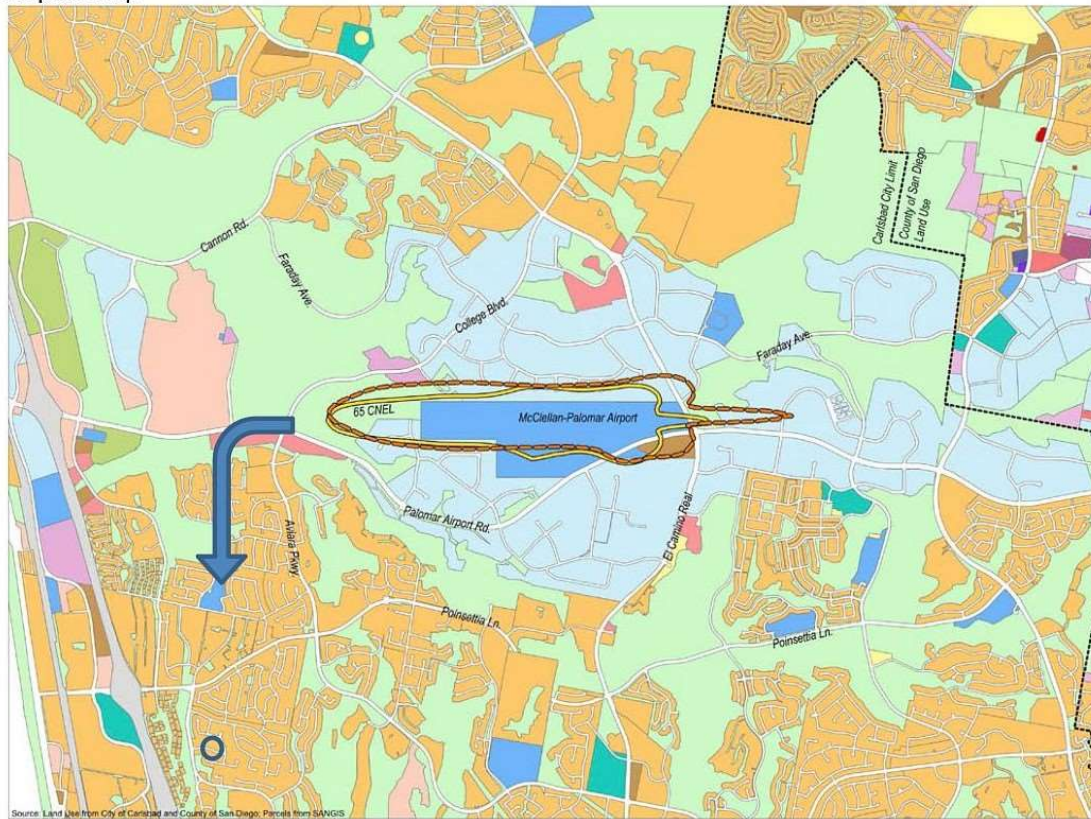
C: California Department of Transportation – Aeronautics Division
City of Carlsbad – City Manager



**MARY & JOE HULL
913 POPPY LANE
CARLSBAD, CA 92011**

March 16, 2018

I62-1
cont.

Airport Map



-  House Location
-  Typical Flight Path

I62-1
cont.

**MARY & JOE HULL
913 POPPY LANE
CARLSBAD, CA 92011**

March 16, 2018



I62-1
cont.

**MARY & JOE HULL
913 POPPY LANE
CARLSBAD, CA 92011**

March 16, 2018



I62-1
cont.

MARY & JOE HULL
913 POPPY LANE
CARLSBAD, CA 92011

March 16, 2018



I62-1
cont.

**MARY & JOE HULL
913 POPPY LANE
CARLSBAD, CA 92011**

March 16, 2018



I62-1
cont.

**MARY & JOE HULL
913 POPPY LANE
CARLSBAD, CA 92011**

March 16, 2018



I62-1
cont.

March 16, 2018

Response to Letter I62**Mary and Joe Hull**

- I62-1** This comment letter was submitted on March 16, 2018. After the County cataloged this comment letter as I62, three days later on March 19, 2018, Mr. Joe Hull submitted a revised letter with corrections. Therefore, Comment Letter I62 (dated March 16, 2018) is included in the record here, but responses are provided further below for Comment Letter I80.

Comment Letter I63

From: Valencia Porter <drvporter@gmail.com>
Sent: Friday, March 16, 2018 3:27 PM
To: LUEG, PalomarMP
Subject: PALOMAR AIRPORT

I am very concerned about possible increase in noise from Palomar Airport expansion. As it is now, there are still planes flying close to my residential area after 9 and 10 pm which is a disturbance. If the noise worsens I will be seriously considering moving out of Carlsbad where I live and also practice medicine.
I am also concerned about potential traffic problems.

I63-1

Valencia Porter, MD, MPH

Response to Letter I63**Valencia Porter**

- I63-1** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

Regarding the commenter's concern of aircraft noise, County staff reviewed this comment for any site-specific location data of the perceived noise. However, the comment does not contain a sufficient location for the County to further study or analyze the noted noise concerns. Although the comment pertains to existing noise conditions, there is no evidence the Proposed Project would result in significant noise impacts. Please refer to Master Responses 1 and 4 in addition to PEIR Appendix D for more information about the supplemental noise analysis conducted for additional locations.

Comment Letter I64

From: areysbergen@juno.com
Sent: Friday, March 16, 2018 9:27 AM
To: LUEG, PalomarMP
Cc: Curtis, Cynthia
Subject: NO.. Palomar Airport Extension/Expansion -- the Legoland effect....

I haven't heard much talk about LEGOLAND ... children, children, children

with increased air traffic - *from an expanded/extended runway* - corporate jets heavily loaded with jet fuel to fly non-stop to China as well as commercial flights already in the making ...

ALL planes lift off - OVER LEGOLAND !!

take offs and landings are the most dangerous moments in air travel !!

a corporate jet fully loaded with jet fuel to fly non-stop to China would make a BIG splash CRASH landing at LEGOLAND probably not good PR for San Diego County

I64-1

sincerely...
alice reysbergen
resident, property owner and registered VOTER

Response to Letter I64**Alice Reysbergen**

- I64-1** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. The City of Carlsbad is the lead agency for approving land uses surrounding the Airport. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

Comment Letter I65

From: Louise Stiles <louisestiles@sbcglobal.net>
Sent: Friday, March 16, 2018 3:29 PM
To: LUEG, PalomarMP
Cc: Louise Stiles
Subject: Comment re Palomar Mclellan Airport expansion

i am retired FAA after 33 years. I love aviation. We moved to Carlsbad when it had commercial flights.. If this expansion supports bringing back some commercial aviation I am all for it. This is why we initially moved here. ??? Who was here first????

I65-1

Thanks, Louise

Louise E. Stiles 2279 Lindsay Dr. Carlsbad, CA 92008 760.431.2279 760.419.3339 cell louisestiles@sbcglobal.net

Response to Letter I65**Louise Stiles**

- I65-1** This comment states support for the commercial air service at the Airport. While this comment does not specifically address the adequacy or accuracy of the environmental analysis provided in the PEIR, this comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

Comment Letter I66

From: Chris Carroll <christopher_carroll@outlook.com>
Sent: Saturday, March 17, 2018 2:27 PM
To: LUEG, PalomarMP
Subject: Noise Abatement in Northern San Marcos and Proposed Runway Extension

I feel like the runway extension is cart before the horse. We are suggesting improvements before solving the community noise issues.

I66-1

Either as part of, or even before, the runway extension please consider updating the noise abatement for CRQ to avoid the Palomar college community / Richmar community during the RNAV (RNP) Z approach for runway 24.

I am a property owner in the NINA area for CRQ (at 841 Plumeria St, San Marcos, CA 92069), and altering the RNAV Z flight track to be slightly southward, closer to San Marcos Rd would be a great benefit to those in these areas in San Marcos. The higher power spectral density in the higher frequencies for most jets along with the consistency of flight patterns with the advent of NextGen and RNP is so much greater that quality of life has suffered in this beloved San Marcos area.

I66-2

Thank you for your consideration.

Best Regards,

-Christopher R Carroll

Response to Letter I66**Christopher Carroll**

- I66-1** The comment pertains to noise abatement and revisions to existing aircraft approach procedures. As discussed in **Master Response 7 (FAA Involvement and Oversight)**, the Federal Aviation Administration maintains jurisdiction and regulatory enforcement over aircraft in flight. Accordingly, neither the County nor the City of Carlsbad has the authority to implement mandatory noise abatement procedures at the Airport. Please also refer to **Master Response 3 (Voluntary Noise Abatement Procedures)**. No further response is required.

Regarding the commenter's concern of aircraft noise, County staff researched the location provided by this comment and confirmed the location is outside of the 65dB contour (i.e., less than 65dB) under all scenarios. Specifically, the existing noise condition at the location provided was estimated to be 46.38dB, and its future condition without the Proposed Project is estimated to be 48.82dB. Assuming full implementation of the Proposed Project (PAL 2), the estimated future noise condition would be 51.01dB. This is below the threshold of significance of 65dB CNEL. Although the comment pertains to existing noise conditions, there is no evidence the Proposed Project would result in significant noise impacts. Therefore, because the location would be outside of the 65dB contour, no significant noise impacts would occur, and no changes to the PEIR are required. Please refer to Master Responses 1 and 4 in addition to PEIR Appendix D for more information about the supplemental noise analysis conducted for additional locations.

- I66-2** See **Response to Comment I66-1**. The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

Comment Letter I67

From: John Roberts <redgerm@me.com>
Sent: Sunday, March 18, 2018 3:43 PM
To: LUEG, PalomarMP
Subject: Palomar Airport Master Plan

I am a retired FAA air traffic controller and commercial pilot/flight instructor. I am also a Carlsbad resident.

I am opposed to the proposed lengthening of the runways at CRQ. Any lengthening of the runway will result in larger aircraft utilizing the airport and more noise.

Thank you for your consideration,

John Roberts

I67-1

Response to Letter I67**John Roberts**

- I67-1** The County acknowledges the comments; however, they do not raise an issue concerning the analysis of adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

Regarding the commenter's concern of aircraft noise, County staff reviewed this comment for any site-specific location data of the perceived noise. However, the comment does not contain a sufficient location for the County to further study or analyze the noted noise concerns. Although the comment pertains to existing noise conditions, there is no evidence the Proposed Project would result in significant noise impacts. Please refer to Master Responses 1 and 4 in addition to PEIR Appendix D for more information about the supplemental noise analysis conducted for additional locations.

Comment Letter I68

From: Ronald Ceyba <forsoundfacts@aol.com>
Sent: Sunday, March 18, 2018 9:35 PM
To: LUEG, PalomarMP
Subject: Opinion - Attn: Cynthia Curtis
Attachments: Palomar Airport.docx

I68-1



March 18, 2018

Cynthia Curtis
County of San Diego
Department of Public Works
5510 Overland Avenue, Suite 410

Dear Ms. Curtis

After representing other interested residents at a March meeting held by Carlsbad Council member, Cori Schumacher, I expressed an opinion that the Palomar Airport plan is intended to preclude a vote by the residents of Carlsbad because the plan will not result in an “expansion.”

When Carlsbad Municipal Code 21.53.015 was implemented in 1980, the word “expansion” was obviously the intent to preclude any increase in airport activity that would expand by additional services that would exceed the original intent of the limitations of a municipal airport.

Should the aforementioned Carlsbad Municipal Code have substituted the word “expansion” with “extension” it would not be applicable to the greater concern of not wanting to increase Palomar Airport activity. Therefore, “expansion” was the best suited word that was intended to be more comprehensive in limiting the scope of any future proposals. The two words by definition are synonymous to one another.

To extend the runway and add another is simply a means to, in fact, “expand” the activities of Palomar Airport under the pretext of “safety” for the expected larger airplanes. Even the proponents of extending/expanding Palomar Airport expressed their belief that the airport has a credible safety record. It then becomes obvious that the current proposal benefits a few at the expense of many, thus reducing the quality of life of Carlsbad residents in proximity to the airport and having an adverse effect to the city in general.

A Master Plan of this magnitude needs to be voted upon by the very residents that it impacts.

Sincerely,

R. J. Ceyba
P.O. Box 4324
Carlsbad, CA 92018
(760) 214-3122

I68-1
cont.

Response to Letter I68**R.J. Ceyba**

- I68-1** Please refer to **Master Response 5 (Airport Expansion/Public Vote)**. The comment does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

Comment Letter I69

From: Michael Goldbeck <mpgoldbeck@gmail.com>
Sent: Sunday, March 18, 2018 7:13 PM
To: LUEG, PalomarMP
Subject: Comments on the McClellan-Palomar Master Plan and DRAFT Environmental Impact Report
Attachments: Comments on the McClellan-Palomar Master Plan and DRAFT Environmental Impact Report.doc

Dear Ms. Curtis,
Please find attached comments on the McClellan-Palomar Master Plan and Draft EIR.
Michael Goldbeck

I69-1

County of San Diego, Department of Public Works
Attn: Cynthia Curtis

Date: March 18, 2018

Re: Comments on the McClellan-Palomar Master Plan and DRAFT Environmental Impact Report

Dear Ms. Curtis,

Our family lives in Carlsbad about 1/4 mile from the intersection of Corinia and Alga. We have two family members in our residence. We like to walk in the area and visit the Agua Norte Park. We believe our family may be adversely affected by the changes as proposed.

I69-2

We submit these comments on the McClellan-Palomar Airport Draft EIR so that San Diego County may respond directly to each of our concerns in its Final EIR. We are looking for specific information that applies to our neighborhood, La Costa Meadows Elementary School, and Agua Norte Community Park -- not to the city as a whole. Our Draft EIR questions are:

Noise: General Questions

- a. How many aircraft flew within 2 miles of the above noted intersection in 2015, 2016, and 2017? What was their range of altitudes above the intersection? How many used McClellan-Palomar Airport?
- b. How many aircraft flew within 2 miles of the above noted school(s) in 2015, 2016, and 2017? What was their range of altitudes above the schools? How many were from McClellan-Palomar Airport?
- c. How many aircraft flew within 2 miles of the above noted park(s) in 2015, 2016, and 2017? What was their range of altitudes? How many were from McClellan-Palomar Airport?
- d. What are the applicable federal, state, and local laws that limit the height of aircraft above our residences, schools, and parks? What are the minimum altitude limits that apply above the intersection, schools, and parks noted above?
- e. We understand that California, including California court rulings, require airports to measure Single Noise Exposure Levels (SNEL). Is this correct? Discuss the law that applies. If such measurements are required, what SNEL did San Diego County measure over the residences, schools, and parks noted above in 2015, 2016, and 2017? If none were made, explain how the county's 2017-2037 McClellan-Palomar Airport Master Plan will improve gathering and disclosing this information.
- f. We understand that McClellan-Palomar Airport installed only two noise monitors on or near the airport in 2017 to replace a larger number of noise monitors it previously maintained. Why did McClellan-Palomar Airport reduce the number of noise monitors? Is McClellan-Palomar Airport complying with any noise monitor requirements that it agreed to in the 2006 Part 150 FAA Noise Compatibility Agreement?
- g. Does McClellan-Palomar Airport have a mobile noise-monitoring device that it can take out to neighborhoods that experience excessive noise? How do I get a McClellan-Palomar Airport noise monitoring device in my neighborhood?
- h. Has San Diego County had programs to retrofit homes or schools especially affected by airport noise? If so, what are the specifics? If not, explain why not since such measures could be mitigation that could be included in the McClellan-Palomar Airport EIR.
- i. Please include in the 2017-2037 McClellan-Palomar Airport EIR discussion of noise mitigation measures (i) a program whereby county will monthly contact each school principal within a radius of 10 miles to determine how many times a day teachers must halt instruction due to aircraft noise and determine the number of students affected and (ii) how the County will monthly report this information at its Palomar

I69-3

Airport Advisory Committee (PAAC) meetings and (iii) what steps the County can take to mitigate such noise interference to the extent it exists.

169-3
cont.

2. **Training Flights: Noise & Safety**

We are concerned about changes that San Diego County has implemented since 1980 at McClellan-Palomar Airport, which affect our community's safety and noise, which relate to training flights. We understand that in 1980 the County began operations at McClellan-Palomar Airport and agreed that McClellan-Palomar Airport would operate as a "general aviation basic transport" airport. The FAA says that term means an airport that handles no more than 2500 scheduled operations a year. We also understand that in the 1980s, San Diego County resolutions allowed McClellan-Palomar Airport to limit training flights to control noise.

We understand that training flights do involve foreign pilots with minimal English skills and minimal aviation skills – which raise safety concerns as such pilots undertake many "touch and go" operations leading to our neighborhoods. We understand that several of the September 11, 2001 pilots used local airports, including possibly San Diego, to train. Despite these past limitations, we understand that San Diego County intends, under its 2017-2037 McClellan-Palomar Airport Master Plan and recent leasing practices at McClellan-Palomar Airport and Gillespie Field and other County airports, to increase flight levels far above those of a "general aviation basic transport" airport and intends to increase flight training at McClellan-Palomar Airport.

169-4

- a. Of McClellan-Palomar Airport's 2015, 2016, and 2017 operations, about what percent each year and how many each year were "touch and go" training operations using McClellan-Palomar Airport facilities?
- b. What neighborhoods, schools, and parks did such training flights fly over in 2015, 2016, and 2017 and about how many times each year?
- c. Assuming training flights conduct "touch and go" operations at multiple county airports located within 50 miles of each other, (i) what percent of such operations are conducted between 500 and 1000 feet and (ii) between 1000 feet and 2000 feet above houses in our neighborhood, our schools, and our parks? We are concerned that training aircraft flying very short distances fly at comparatively low altitudes and make multiple turns over our neighborhoods in contrast to aircraft traveling several hundred miles, which may leave McClellan-Palomar Airport and fly over our neighborhoods, schools, and parks only once during that flight.
- d. Does McClellan-Palomar Airport gather the information related to the number of "touch and go" flights at its airport every day? If not, why not? Please add to the 2017-2037 McClellan-Palomar Airport EIR discussion of noise mitigation measures that San Diego County could take to limit the noise and safety risks of aircraft conducting "touch and go" training flights.

3. **Safety: Air Pollution from McClellan-Palomar Airport Aircraft Using Leaded Aviation Fuel**

We understand that anyone walking within 500 feet of the McClellan-Palomar Airport runway will smell a strong odor of aviation fuel and that some customers at Lowe's, across from the airport and/or at Costco a few miles from the airport, can smell an aviation fuel odor in the air. We understand that the FAA requires larger aircraft to use non-leaded fuel but still allows smaller aircraft to continue to use leaded fuel. We understand that in 2016 or 2017, the EPA issued a report finding a problem with leaded fuel emissions at McClellan-Palomar Airport but that San Diego County disagreed with the EPA's findings.

- a. Please include in the McClellan-Palomar Airport EIR a discussion of (i) the EPA's initial findings, (ii) the county's response, and (iii) a statement of what the EPA's current position is after hearing the County's views.
- b. In 2015, 2016, and 2017, how many smaller aircraft flights (defined as aircraft weighing less than 15,000 pounds) flew over our neighborhood, schools, and parks? What was the average altitude of these

169-5

flights over each impacted area? How much leaded aviation fuel emissions do these aircraft produce over the impacted area during each pass? What are the health impacts on our children by such emissions? Please cite the relevant studies and refer to the relevant pages in the study in responding to our request.

c. How many elderly or health-challenged residents live within a (X) mile radius of McClellan-Palomar Airport? What is the impact of leaded emissions on such challenged residents?

d. Please include in the McClellan-Palomar Airport EIR a discussion of when the FAA intends to bar smaller aircraft from using leaded fuel and identify any pending FAA studies reported in the Federal Register or elsewhere soliciting public comment.

e. Discuss in the McClellan-Palomar Airport EIR what percent of McClellan-Palomar Airport flights are smaller aircraft flights and how McClellan-Palomar Airport development will affect these flights. For instance, we understand that current Supervisor Bill Horn stated at a December 2015 Board of Supervisors meeting that given the McClellan-Palomar Airport expansion that San Diego County intended to eliminate the parking for smaller aircraft along the northern border of the airport. Is that true and when would that occur and how would smaller aircraft flights be affected?

I69-5
cont.

4. **Traffic**

The two main road arterials roads that connect Carlsbad, Vista, San Marcos, and Encinitas are the North-South El Camino Real and the East-West Palomar Airport Road. We understand that the 2015-2035 Carlsbad General Plan has predicted gridlock conditions along certain portions of ECR and PAR in the future – even before knowing how McClellan-Palomar Airport would grow in the future. We understand that Elite Air, dba Cal Jet, has projected handling up to 270,000 new passengers at McClellan-Palomar Airport within a few years. We understand that these numbers do not include passengers aboard corporate aircraft. We do not know if they include helicopter passengers. We understand that airports lengthening their runways typically attract more aircraft and passengers. We understand that passengers going to the airport may be dropped off or picked up, thus causing 2 vehicle trips for each passenger movement by the “dropping off/picking up driver”. We understand that gridlocked roads cause drivers to search out alternate roadways to use to minimize their travel time.

I69-6

a. In San Diego County’s McClellan-Palomar Airport EIR, does the data assure the total traffic baseline conditions associated with past users of McClellan-Palomar Airport including corporate and helicopter passenger numbers?

b. Please assure that the data reports the anticipated passenger levels from 2018 to 2028.

c. Analyze how El Camino Real and/or Palomar Airport Rd traffic gridlock will redistribute traffic to alternate roads and at what levels.

d. Identify the specific mitigation measures that San Diego County is committing so traffic impacts may be reduced, included but not limited to contributing money to operational measures to increase traffic efficiency such as assuring that traffic signals can “talk” to each other and more smoothly regulate traffic. If the County is not recommending this measure, explain why not.

5. **Other Specific Concerns**

We believe that the need for a larger airport could be better served by joint civilian/military operation of the Camp Pendleton airport. This would not disrupt our family-based communities and would allow for John Wayne airport type operations.

I69-7

Thank you for the opportunity to comment on San Diego County’s McClellan-Palomar Airport 20 year EIR. Please note that we end this letter with one more concern. We understand that San Diego County calls its McClellan-Palomar Airport EIR a “program EIR” which generally considers future environmental

I69-8

impacts but does not necessarily consider actual project impacts. We understand that when the County prepares environmental documents, the County compares current noise, air pollution, and traffic impacts against forecasted impacts. Please note that if the County fails to answer any of our questions above (such as the number of corporate passengers that the County served in 2015, 2016, and 2017), the County is reporting incomplete baseline data, which makes its 2017-2037 McClellan-Palomar Airport EIR defective and may delay future County project supplemental analysis.

We also recognize that per a 1980 Citizen's Initiative, Carlsbad residents are owed the opportunity to vote on the expansion plans presented in the McClellan-Palomar Airport Master Plan. We anticipate San Diego County will support the outcome of that vote.

Thank you for recognizing our concerns and addressing them in the County's Final Environmental Impact Report.

The Goldbeck-Boyd Family

I69-8
cont.

Response to Letter I69**Michael Goldbeck**

- I69-1** The comment includes introductory remarks and substantive comments are addressed further below in these responses.
- I69-2** The County acknowledges these introductory comments; however, they do not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I69-3** This comment is similar to Comment I48-2. Please refer to **Response to Comment I48-2**. Regarding the commenter's concern of aircraft noise, County staff researched the location provided by this comment and confirmed the location is outside of the 65dB contour (i.e., less than 65dB) under all scenarios. Specifically, the existing noise condition at the location provided was estimated to be 40.01dB, and its future condition without the Proposed Project is estimated to be 39.55dB. Assuming full implementation of the Proposed Project (PAL 2), the estimated future noise condition would be 39.84dB. This is below the threshold of significance of 65dB CNEL. Although the comment pertains to existing noise conditions, there is no evidence the Proposed Project would result in significant noise impacts. Therefore, because the location would be outside of the 65dB contour, no significant noise impacts would occur, and no changes to the PEIR are required. Please refer to Master Responses 1 and 4 in addition to PEIR Appendix D for more information about the supplemental noise analysis conducted for additional locations. No further response is required.
- I69-4** As discussed in PEIR Section 3.1.7.1.2, the description of the Airport as a General Aviation Basic Transport Airport refers to an older weight-based classification that has become functionally obsolete as the FAA no longer uses this terminology or the methodology on which it was based to establish design criteria for airports. In 1980, the County obtained a conditional use permit (CUP-172) for operation of the Airport that described the Airport as a "General Aviation Basic Transport Airport." However, shortly after CUP-172 was obtained, the FAA replaced the system that used that designation with an Airport Reference Code (ARC) system.
- This comment also includes a request for information regarding historical aircraft operations. This request is not related to the Master Plan Update or PEIR, and the comment does not specifically address the adequacy or accuracy of the environmental analysis provided in the PEIR.
- The commenter also requests mitigation measures to address noise impacts associated with aircraft touch-and-go operations. However, the mitigation measures requested by the commenter are not required. The commenter requests further information not related to the PEIR. No further response is required.
- I69-5** This comment is similar to Comment I48-3. Please see **Response to Comment I48-3**. In addition, this comment asks how many elderly or health-challenged residents live near the Airport, and to identify the impacts of leaded emissions. The County Airports Division does not manage population data. As discussed in **Response to Comment I48-3**, a discussion of the EPA-initiated lead study was included in the PEIR Chapter 3.1.2.1. As this comment

does not specifically identify an environmental issue with the PEIR analysis, no changes to the PEIR have been made in response to this comment.

- I69-6** This comment is similar to Comment I48-4. Please refer to **Response to Comment I48-4**. No further response is required.
- I69-7** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I69-8** These are conclusion comments. They do not raise specific issues regarding the content of the PEIR, but will be included as part of the administrative record and made available to the decision makers prior to a final decision on the Proposed Project.

Comment Letter I70

From: Stacy King <stacy.king.us@gmail.com>
Sent: Sunday, March 18, 2018 8:15 PM
To: LUEG, PalomarMP
Cc: Celia Brewer; Manager; clerk@carlsbadca.gov; council@carlsbadca.gov
Subject: McClellan-Palomar Airport PEIR & Master Plan Feedback

Dear Cynthia Curtis et al.,

I wish to express my disappointment in the process that has led to such an incomprehensible and incomplete Master Plan. My background is in Finance and I've never seen nor written anything that has so little backup and support for such an enormous potential change to a community. The money we spent as taxpayers to get such misleading documents from Kimley-Horn & Associates should be audited. I would like to know the due diligence and time that was put into both reports. What are the due diligence numbers and the audited time for the report's completion? How much did we, as tax payers, pay for both reports?

In both reports, the figures from one page differ to the next. Was there a final review to reconcile the financial and passenger numbers, the total flights and commercial vs private flights? How were vehicle miles calculated? Did the numbers include changes to the city since 2009? The responses and conclusions in the preliminary EIR do not take into account so many of the obvious impacts to the site during and after construction. How was it decided that there was little impact to flight paths during and after construction?

How did the writers of the Environmental Impact Report determine there would be so many "less than significant" findings following mitigation in the biology portion? Noise is responsible for so many negative effects on all life forms, be it plants, animals and humans. Were any of those effects during construction taken into consideration when putting together the report? I would like to request a bioacoustics test be done as it relates to both humans, plants and animals and to know the results. How will the construction affect our ecosystems in such a sensitive area of Carlsbad?

Losing the capacity for humans and animals to hear because of the construction and eventual larger aircraft due to the runway length may be an important issue. How will this be addressed? How will the construction and larger aircraft help residents in the city and nearby cities ensure that we will maintain a high quality of life given the fact that quiet and natural sound environments have restorative effects on people and animals? There is so much documentation that identifies quiet helps relieve stress and improve memory. Where is the study that addresses the stress impact that the construction and size of the airport will have on residents? "When the Denver International Airport was redesigning its approach and departure plans-the routes by which aircraft come in and out of an airport-it reached out to Rocky Mountain National Park and asked if there were things it could do that would reduce noise impacts to the park." (Kurt Fristrup, Landscape Architecture Magazine, Fall 2017). Will a similar outreach effort be completed with the Batiquitos, Agua Hedionda and Burna Vista Lagoon Foundations? Can I see the results?

Thank you for your time and I look forward to the Final Environmental Impact Report that will address all of my vital questions about the environment in and around the airport.

Sincerely,

Stacy King
7043 Heron Cir
Carlsbad, CA 92011

Response to Letter I70**Stacy King**

- I70-1** The County acknowledges the comments; however, they do not provide evidence of an error in the CEQA analysis nor evidence of a new significant effect concerning the adequacy of the PEIR pursuant to CEQA Guidelines Section 15088.

The noise and biological analyses prepared for the PEIR were conducted using established methodologies, metrics, and impact significance thresholds. As discussed in PEIR Section 2.4.2, noise impacts associated with future aircraft operations and operation of the Airport would be less than significant. While construction activities could potentially result in temporary noise impacts, implementation of mitigation measures would reduce any construction-related noise impacts to a less than significant level.

As stated in PEIR Section 2.4.1, existing noise contours surrounding the Airport were derived from detailed flight information gathered in 2016 (January 1–December 31, 2016), and existing noise levels were measured at the Proposed Project site with a sound level meter. Indirect effects, including noise, are included in the evaluation of potential impacts to sensitive wildlife species, as discussed in Section 2.2.1.7 of the PEIR and in the Biological Resources Technical Report (PEIR Appendix B). Potentially significant noise impacts to coastal California gnatcatcher would be mitigated to a level of less than significant with implementation of Mitigation Measure M-BI-1b.

Regarding the commenter's concern of aircraft noise, County staff researched the location provided by this comment and confirmed the location is outside of the 65dB contour (i.e., less than 65dB) under all scenarios. Specifically, the existing noise condition at the location provided was estimated to be 44.42dB, and its future condition without the Proposed Project is estimated to be 45.02dB. Assuming full implementation of the Proposed Project (PAL 2), the estimated future noise condition would be 46.04dB. This is below the threshold of significance of 65dB CNEL. Although the comment pertains to existing noise conditions, there is no evidence the Proposed Project would result in significant noise impacts. Therefore, because the location would be outside of the 65dB contour, no significant noise impacts would occur, and no changes to the PEIR are required. Please refer to Master Responses 1 and 4 in addition to PEIR Appendix D for more information about the supplemental noise analysis conducted for additional locations.

Comment Letter I71

From: areysbergen@juno.com
Sent: Sunday, March 18, 2018 8:47 AM
To: LUEG, PalomarMP
Cc: Curtis, Cynthia
Subject: Palomar Airport Master Plan --- re: Civic Helicopters Training School

Civic Helicopters Training School ..

Flight training is conducted at the South end of the airport - next to Palomar Airport Rd.

Trainee helicopter pilots practice flight training - touch downs and lift offs --- on the helipad next to Palomar Airport Rd (which is *directly across the street from the Carlsbad Animal Shelter*.

Then, the helicopters lift off - make a loop south - then return to the helipad .. **the flight path is directly over Lowe's shopping center and the Carlsbad Animal Shelter.**

the helicopters are extremely NOISY ! and very low to the ground .. as they pass over the Animal Shelter...

each trainee will practice - over and over again - it's maneuvers of touching down and taking off.

Helicopter trainees will make many loops - in their training session - low to the ground as they swoop over the animal shelter.

additionally, many of the helicopter trainees spend 20 minutes and more - with copter blades spinning .. generating ghastly noise as well as smelly fuel - attempting to make an accurate touch down as they are hovering over the helipad.

there have been incidents in the past at Carlsbad Airport with helicopter crashes - if a trainee makes a mistake (miscalculation) - it would jeopardize not only human lives but the lives of the entire animal shelter.

the Public comes and goes at all times of the day to visit the shelter. so, the Public is now at jeopardy, too!

*this seems the appropriate time to re-evaluate the re-location of the Civic Helicopters Training School and/or .. **practice flight pattern** ...*

thank you,
a. reysbergen
San Diego Resident/Property Owner/Voter

I71-1

Response to Letter I71**Alice Reysbergen**

- I71-1** The County acknowledges this comment. Helicopter operations were included in the data used in Section 2.4 Noise analysis. However, the comment does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

Regarding the commenter's concern of helicopter noise, the comment identifies that the facilities in question (Lowe's shopping center and Carlsbad Animal Shelter) are located immediately across the street from McClellan-Palomar Airport. Those properties are zoned by the City of Carlsbad as Planned Industrial and General Commercial, and are accordingly, not considered noise-sensitive land uses as defined by FAA, the Caltrans Airport Land Use Planning Handbook, or the San Diego County Regional Airport Authority. Therefore, although the comment provides site-specific location data of the perceived noise, the identified properties are compliant with City zoning and FAA noise regulations; therefore, further noise analysis is not required for these facilities. Furthermore, the Master Plan Update does not introduce new uses, and it involves the continuation of existing aviation uses as outlined in the Airport Master Plan Update consistent with the City's General Plan zoning designation.

Comment Letter I72

Sigrid Tehrani
3194 Corte Tamarindo
Carlsbad, CA 92009
Phone: 760-846-4496
March 18, 2018
To: Community Input / Palomar Airport Master Plan, PalomarMP@sdcounty.ca.gov

Re: Citizen Input on Palomar Airport Master Plan

I want to step out of the weeds for a 10,000 foot view of the Palomar Airport Master Plan, so to speak.

The stated reason for a longer runway is to improve safety for larger airplanes at our airport, which is too small for them. My rhetorical question: Why are these larger airplanes landing at an airport not designed for them?

They do so because they choose to. As the FAA points out, it is pilot discretion when it comes to determining whether or not to land at an airport ... or in this case squeeze into an airport.

Based on FAA rules, we can't stop them. But that doesn't mean we have to accommodate them.

If a pilot uses poor judgment and chooses to land at an airport not designed for his aircraft, why must the citizens of Carlsbad assume the responsibility for their poor choices? And, in the process, accept the financial and societal burdens from noise, to pollution and the attendant uptick in cancer rates and other illnesses. In a vacation spot like Carlsbad with its envious location on the coast, this truly is a case in which we "pave paradise, and put up a parking lot."

Yes, make the airport safer for the aircraft it was designed for. But we are not required to biggie size it.

Local pundits often refer to the FAA forecasts of increased flight activity, seemingly implying that we need to meet those growing and intrusive demands that threaten the quality of life throughout North County.

But that's wrong.

Those forecasts exist because the grant process – which is akin to going to the bank and asking for a loan – requires it. But the grant process does not demand that you ask for money or make your airport bigger, just like a bank doesn't require you to buy a bigger house.

I72-1

Sigrid Tehrani
Citizen Input on Palomar Airport Master Plan
March 18, 2018

Page 1

I remember researching noise complaints about airports a couple years go and reading an enlightening FAA comment: If you don't want noise, don't ask for a bigger airport.

It's as simple as that.

The reality is that we don't need to accommodate bigger airplanes.

But to maintain the quality of life here, we do need to meet the needs of North County residents, who live here 365 days a year and will bear the burden of a larger and noisier airport.

These are the people who day in and day out face increased pollution. There is the visible pollution that is left as chemical residue on their cars. But there is also pollution that spreads sight unseen, the kind of pollution that leaves its fingerprint in increased cancer rates around airports.

And last but not least, North County bears the burden of noise.

The noise contours drawn on the Master plan are telling because they outline precisely the limits of the PAAC's concerns. They don't really care about anything outside those lines.

Sure they'll fill out forms to pacify complainers. They'll even do a little PR about voluntary quiet hours. But it's just PR. It has no teeth. That leaves North County residents dependent on the kindness of strangers and community outsiders to salvage the essential qualities in our own town.

Or to put it another way: Carlsbad citizens bear the burdens of airport expansion while corporations reap the benefits. Privatized profits. Socialized costs.

But it doesn't have to be that way. We have the option to choose improved safety for the planes for which this airport was designed without opting for longer runways.

I'll say it again, the FAA doesn't require you to get bigger. The AIP and the forecasts included in them are there to justify grant requests, not to justify bigger airports.

This airport was created and sized as a General Aviation Airport. Quit trying to stuff 10 pounds of flour in a 5-pound bag.

Cargo Planes

As every shuttered retail store tells us, cargo and shipping is the new darling on the economic horizon. When it absolutely, positively has to be there, the question for Carlsbad is: How does a

I72-1
cont.

I72-2

longer runway in our town fit into the equation? With a FedEx warehouse right here, perhaps too well.

If Plan 5 is adopted, they've got two out of three essentials: A warehouse and a runway. Now all they need is space on the tarmac.

I broached the subject of cargo planes last week with Airport Manager Brackett. Could a longer runway turn Carlsbad into the queen of the night for cargo planes? Since John Wayne shuts down at night, a grandfathered FAA clause denied Carlsbad, consider how easy it would be to divert to Carlsbad ... all night long.

Brackett assured me that scenario is impossible because all though the 737 cargo plane could land at Palomar, it could not maneuver here for lack of space.

In addition, he noted many times he could not acquire any more tarmac space without breaking 30-year leases and incurring expensive lawsuits.

He assured me it was a NO GO. Impossible.

But then I did some digging. What the airport manager failed to mention, is that Palomar *can* insert language into 30-year leases that allows the airport to buy owners out with just a 200 day notice. And, in fact, they have already done so.

This opens the door to creating the tarmac space cargo planes need for midnight runs, when it absolutely, positively has to be there ... at 1 am, 2 am or 3 am.

So, though the purported goal of an expanded runway is to court corporate jets, what are the unintended consequences of a longer runway? A longer runway may suit the goal of helping corporate jets, but it also opens the door to cargo planes on midnight runs. We have no control over what plane types and sizes land here. And we never will.

The sad reality is, laws, rules, and leases can be rewritten and loopholes created to suit the needs of any corporation that comes courting representatives who value money over quality of life in our fair city.

As we all know, Palomar started as a General Aviation Airport. Now, without the prescribed vote of Carlsbad citizens, it's a regional airport. See how easily the rules are changed, right under our noses?

If laws won't protect us, what will?

172-2
cont.

In the end, our strongest protections lie in the laws of physics. Bigger planes can't land if the runway is too short. It's a law of physics. So don't open the door to bigger airplanes by building longer runways.

As the FAA says: If you don't want a bigger airport, don't ask for funds to build a bigger airport.

And, make no mistake, once we open the door to larger aircraft, the cycle will begin again with even larger aircraft opting to elbow their way in.

The cycle is never ending.

If we let today's Master Plan kowtow to accommodate planes too big for the airport, rest assured, in 20 years the next class of oversized planes will again be at our door demanding we "biggie size" our airport.

And at that point the Master Plan pundits will be demanding imminent domain. John Wayne 2.0

The Cost-Benefit Ratio

A runway built on pilings could easily end up among the most expensive per square foot runways in the US. What is the cost-benefit ratio?

Is this, as implied at the last public hearing, all for one plane that takes off to China once a week? Is that Qualcomm's plane?

Qualcomm is on the auction block and is in an existential battle with Apple. And, as one Seattle tech writer implied in writing about San Diego, the city is one merger away from losing its corporate crown. It's not farfetched to say if Apple dumps Qualcomm, our jewel could be hocked as Qualcomm ends up in bankruptcy.

And we want to build a runway for them?

And even if Qualcomm survives, what is the cost-benefit ratio when you have the mind-boggling cost of building a runway on pilings in an oozing, corrosive landfill?

In conclusion, stop the runway expansion at Palomar. Maintain the airport for its original intent as promised to Carlsbad citizens.

Best Regards,

Sigrid Tehrani

Sigrid Tehrani
Citizen Input on Palomar Airport Master Plan
March 18, 2018

Page 4

172-2
cont.

172-3

Response to Letter I72**Sigrid Tehrani**

- I72-1** The County acknowledges the comments; however, they do not raise an issue concerning the analysis of adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

Regarding the commenter's concern of aircraft noise, County staff researched the location provided by this comment and confirmed the location is outside of the 65dB contour (i.e., less than 65dB) under all scenarios. Specifically, the existing noise condition at the location provided was estimated to be 39.59dB, and its future condition without the Proposed Project is estimated to be 38.98dB. Assuming full implementation of the Proposed Project (PAL 2), the estimated future noise condition would be 39.18dB. This is below the threshold of significance of 65dB CNEL. Although the comment pertains to existing noise conditions, there is no evidence the Proposed Project would result in significant noise impacts. Therefore, because the location would be outside of the 65dB contour, no significant noise impacts would occur, and no changes to the PEIR are required. Please refer to Master Responses 1 and 4 in addition to PEIR Appendix D for more information about the supplemental noise analysis conducted for additional locations.

- I72-2** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I72-3** The County acknowledges the conclusion comment. This comment does not raise specific issues regarding the substantive environmental analysis conducted within the PEIR. The comment will be included as part of the administrative record and made available to the decision makers prior to a final decision on the Proposed Project.

Comment Letter I73

From: Graham Thorley <graham.thorley@sbcglobal.net>
Sent: Sunday, March 18, 2018 1:49 PM
To: LUEG, PalomarMP
Subject: Palomar Master Plan Comments and Questions
Attachments: 2018 CRQ Master Plan Comments and Questions.pdf

Email: PalomarMP@sdcounty.ca.gov

Mail: County of San Diego, Department of Public Works

Attn: Cynthia Curtis
5510 Overland Avenue, Suite 410
San Diego, CA 92123

Find enclose my comment and questions on the McClellan-Palomar 2018 Airport Master Plan.

Graham R. Thorley

I73-1

Graham R. Thorley • SaveCarlsbad.com • graham.thorley@savecarlsbad.com

Email: PalomarMP@sdcounty.ca.gov

Date March 18, 2018

Mail: County of San Diego, Department of Public Works

Attn: Cynthia Curtis

5510 Overland Avenue, Suite 410

San Diego, CA 92123

It must be stated, given all the statements on the future plans for McClellan-Palomar Airport (Palomar) by Supervisor Bill Horn (We are planning for a big Major Commercial Operation) and Carlsbad Mayor Matt Hall (the sound of Money) have given over the last seven (7) years, this new Master Plan (Plan) is void of that pertinent information. In fact, this Master Plan is completely opposite of the stated future direction indicated by both the County Supervisor and the Carlsbad Mayor.

I73-1
cont.

Additionally, the Plan is less than truthful in its statements this is all about safety. In 2012 the FAA issued an Advisory Circular 150/1500-13A stating for any C/D-III airport wishing to upgrade with FAA funding, the runway to taxiway centerline must be a minimum of 400 ft.; however, for older airports, if NO FAA monies are required, the airport is grandfathered and not required to comply with the 400 ft. requirement. But in 2015, the FAA revised that requirement with the issuance of the 2015, AC 150/5300-13A document to state the 400 ft. separation is now required for any airport that upgrades to a C/D-III airport.

I73-2

Consequently, County personnel must be aware of the revised 2015 FAA 150/5300-13A document, but there is no mention of the runway to taxiway 400 ft. minimum separation in the Master Plan documentation. Why?

Then there is the question with the mandated 400 ft minimum separation and why is alternative B-II shown as an option. That option does meet today's FAA specifications for B-II Airports, but not C/D-III Airports.

Maybe this is the answer, there are buried statements in both the DRAFT Master Plan and PEIR document that indicate the three (3) phases will happen at the same time. For instance, in the PEIR it states "... *While the Airport Master Plan serves as a useful tool for planning and project funding purposes during a 20-year period, implementation of individual projects is dependent on available funding and current priorities....*"

I73-3

Therefore, the Plan must be considered nothing but a "Bait and Switch" effort to cover up the County's real intent for the airport expansion as expressed by Supervisor Horn and Mayor Hall.

Consequently, it must be assumed the real intent, as subliminally expressed numerous times in the Master Plan and PEIR, is to turn Palomar into a Mini John Wayne airport and allow:

- Corporate business jets to fly to China and Europe nonstop from McClellan-Palomar Airport (Palomar) as stated in the Plan. (But the reality - today only one (1) plane once a week requires that ability.)
- Large commercial airline access to the airport and bigger more noisier aircraft with more passenger capability. (The airport has had numerous small commuter airlines fail because of no convenient interline connections to larger airlines flight routes.)

- Cancellation of the F-44 County form that limits the number of maximum passengers that can be on an aircraft flying out of Palomar. (see last sentence on Page 2-44 of the Master Plan Draft)
- Removal of the small recreational aircraft completely from Palomar as expressed by Bill Horn in the December 15, 2015 Board of Supervisor Meeting.

I73-3
cont.

That said, maybe it is a good time to define Fiduciary Responsibility:

- Fiduciary:
A fiduciary is a person who holds a legal or ethical relationship of trust with one or more other parties (person or group of persons).
- Fiduciary Duty:
Exist to ensure that those who manage other people's money act in their beneficiaries' interests, rather than serving their own interests.
- Beneficiaries:
Carlsbad, Encinitas, Escondido, Oceanside, San Marcos, Valley Center and Vista with a total population of roughly 589,096. Additionally, the small recreational aircraft owners presently based and invested in Palomar.

I73-4

Per the Plan, a breakdown of Palomar's operations in 2016 were 73% general/recreational aviation aircraft in the following proportions:

- 63% were single-engine piston
- 5% were turboprops
- 5% were helicopter

Jet aircraft comprised the rest of the operations at 22%. But a number of those jets were Design Class B-II. The Plan does not breakdown how many of the jets were Class C/D-III, but it has to be assumed that number is less than 50% of the 22% total Jet figure or around 11% or less.

Not mentioned in this Plan is the well respected and proven valid FAA and Orange County projections of property devaluation around airports. The reports show an average of 18.6% (FAA) or 26.7% (Orange County) drop in property values as airport average noise levels increase.

I73-5

Lastly, there is no mention of the general population health and children learning issues resulting from the increased noise and greenhouse gas pollution created by the airport.

I73-6

With the above statements the Master Plan and PEIR are grossly incomplete and need to be reissued for public review when the facts shown above are corrected. Additionally, when they are rereleased the public needs more than 60 days to review. The fact is this complicated plan is no different than *Caltrans*® construction projects. For small construction projects *Caltrans*® allows a minimum of 90 days and up to six (6) month for more complicated projects. With so many contradictions and omissions in this plan, for the County to restrict the review to only 60 days is further indication of the County trying to be less than truthful in its intent for Palomar.

I73-7

Thank you,

Graham R. Thorley

Graham R. Thorley • SaveCarlsbad.com

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Master Plan and PEIR Questions and Comments

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cont.

McClellan-Palomar DRAFT Program Environmental Impact Report - PEIR		
Item #	Document Page # & Section #	DRAFT PEIR Comment Question
# 1	Page 1 Last paragraph in Chapter 1 Introduction	<p><i>"... reflects the limits of their authority as ground-facility managers."</i></p> <p>Therefore, as ground-facility managers, the most important responsibility is enforcing all zoning laws and FAA requirements. This whole Master Plan (Plan) is about the need to extend and/or move the runway now and in the future. That said, before this plan can be presented to the San Diego Board of Supervisors the Plan has to be first be approved by the <u>City of Carlsbad, CA</u>. Given that fact and the County has recognized and complied with Carlsbad zoning requirements for more than forty (40) years there does not seem to be any description of How, When and Where the County plans to comply with Carlsbad LAW. Before the Plan can be implemented, it must be first approved by the majority of Carlsbad registered electorate.</p> <p>That said, on January 30, 2018, Lee Ann Lardy, Project Manager - County of San Diego Airports Manager, stated the County has no plans to request approval from Carlsbad. The County is in full compliance with the law <u>because the work will be done inside of the existing airport boundaries</u>.</p> <p>Please explain after 40 years of compliance with Carlsbad's Ordinance 21.53.021 and Conditional Use Permit (CUP) 172 List of Conditions not requiring City Zoning approval, the County now feels it can extend the runway? <u>The runway is not listed as an item the County can modify without amending CUP 172</u>; therefore, the County needs Carlsbad's approval to extend the runway inside or outside of its present boundaries.</p> <p>Furthermore, the California Aeronautical Code and the San Diego Regional Airport Authority both agree on the definition of an airport expansion.</p> <p>"2.12 Review of airport master plans and development plans states in 2.12.1 <u>"Airport expansion is defined to include the construction of a new runway, the extension or realignment of an existing runway, and the acquisition of runway protection zones, or the acquisition of any interest in land for the purposes identified above."</u></p> <p>Please explain why the County is not in agreement with both California Aeronautical Code and San Diego Airport Authority definition of an airport expansion.</p>
# 2	Page 2-1 Objectives	<p>1. Safety along with 2, 3, 4, 5, 6, and 7. Offsite Impacts.</p> <p>Please explain how as ground-facility managers the County has not violated its fiduciary responsibility by orchestrating a false narrative for the need to expand the airport.</p> <p>FACT, CRQ is a FAA Certified Class B-II airport. As such and before the County, starting in 2004, to force the small recreational aircraft out to make way for the larger business jets, the airport was always profitable. BUT, it has been reported starting in 2011 that profitability disappeared and CRQ has lost</p>


I73-8


I73-9



		<p>millions of dollars each year since.</p> <p>Furthermore the County states it cannot restrict the type of aircraft that uses its facilities. That is only partially true. It cannot stop C/D-III planes from landing; BUT, it can prevent C/D-III planes from routinely flying out of CRQ! As ground-facility managers, the County has the authority to simply not lease airport space to any aircraft that is not a B-II aircraft.</p> <p>But based on the County's false narrative for why the airport <u>must</u> expand, the County has deliberately created an inaccurate narrative for justifying the need to accommodate C/D-III aircraft.</p> <p>Fact, unlike what has been presented in this Plan and public meetings, the <u>FAA does not require</u> an airport to expand if more than 500 operations of a certain aircraft type is recorded at an airport. The <u>FAA ONLY recommends</u> an airport consider upgrading.</p> <p>Consequently, the County not only is being less than truthful, it is attempting to violate Carlsbad Zoning LAWS.</p> <p>Please explain how the above is not factual.</p>	I73-9 cont.
# 3	Page 1-4 Section 1.1.2	<p>The runway length is 4,897 feet.</p> <p>Please Supply Carlsbad's approval documentation giving the County the authority to extend the runway from its original 4,700 feet.</p> <p>Fact, without the County applying for a runway extension through Carlsbad's Ordinance 21.53.015 and CUP 172 process the County is in violation of Carlsbad's zoning regulations.</p>	I73-10
# 4	Page 1-4 Section 1.1.2 Last Paragraph	<p><i>"The runway width at CRQ is 150 feet. ... certified takeoff weight of 60,000 pounds ..."</i></p> <p>In the Public Workshop #4, it was stated the future airport design template is the upcoming Bombardier Global 7000/8000 business jet and the new runway would be constructed with 125,000 PSI concrete. There is no mention of the 125,000 PSI concrete construction of the new runway.</p> <p>Please provide the PSI strength of the planned new runway.</p>	I73-11
# 5	Page 1-5 1.1.4 Improve the Capacity and ...	<p><i>"Master Plan Updates would allow for the necessary space and physical changes to further support the Airports ability to anticipated increases in air transportation ..."</i> This section indicates there has been a discussions of larger facility but there are no plans shown what those facility would be. Please provide the future plans for increasing the airport facilities.</p>	I73-12
# 6	Page 1-5 1.2 Project Description	<p>Please explain how this Plan will comply with California AB-32, AB-52, AB-198, AB-350, AB-617, SB-743 and the California Supreme Court, Greenhouse Gas, ruling in November 2015, stating - "a developer can no longer say the project is environmentally neutral, the developer MUST PROVE IT.</p>	I73-13

# 7	Page 1-6 through 1-8 1.2.1 Project's Component Parts	<p>Given that the airport:</p> <ol style="list-style-type: none"> 1. Has been mostly a small "lead based fuel" recreational airport for most of its existence. 2. Failed the EPA 2011 Lead Air Quality test and thus far as we know has not corrected the cause for the failure. <p>It has to be assumed when any construction and relocation of structures occur, there will be tons and tons of lead contaminated earth that will be required to be excavated. Other than the standard non descriptive "we will meet all state, county and city environments laws.", Please explain exactly how that will happen and how much is budgeted to accomplish this part of the Plan.</p>	173-14
#8	Page 1-7 Extension of the Runway 06-24 (200 feet to the east)	<p>Given Carlsbad is:</p> <ol style="list-style-type: none"> 1. A responsible agency under the meaning of CEQA Environmental Quality Act. 2. In 1980, the County voluntarily applied for and obtained a Conditional Use Permit (CUP) 172 from the City of Carlsbad to operate the airport. 3. CUP 172 Lists of Conditions under which the airport can operate. 4. In the CUP 172, <u>the runway is not listed as an item the County can change or modify</u> without applying for an amendment to CUP 172. 5. CUP 172 is legally tied to Carlsbad Ordinance 21.53.015 6. Ordinance 21.53.015 states any required amendment to CUP 172 can only be approved by the majority of Carlsbad registered electorate. <p>Please Explain As stated previously, since 1980, the County has complied with Carlsbad's Ordinance 21.53.015 and CUP 172 Conditions, other than the flimsy wording completely rewriting the meaning of CUP 172 and the Ordinance on Pages 3-89 and 3-90, How, without Carlsbad's VOTERS approving the Plan --- how the County intends to legally continue with any airport expansion without Carlsbad's approval.</p>	173-15
# 9	Page 1-15 1.6.2 Environmental Review	<p><i>The Draft PEIR will be circulated for review and comments by the public and other interested parties, agencies, and organizations for 45 days.</i></p> <p>The County spent more than four (4) years developing this complicated Master Plan and PEIR. When it was finally released there were over 3,500 pages of information for the public and other concerned parties to review in 45 day (eventually extended to 60 days). Compound that with contradicting or missing information in the material provided for review.</p> <p>Please explain:</p> <ol style="list-style-type: none"> 1. How this is compliant with the CEQA process and its intent! 2. The County is not ignoring the public interest and subverting the system! <p>CEQA does state a <u>minimum</u> of 45 days is needed to be provided for</p>	173-16

		<p>review by all interested parties, BUT for such a complicated project, most government agencies provide 100 days to allow for complete review and educated comments.</p> <p>Frankly, this processes smacks of a project being ramrodded through the system and the public interest is being totally ignored and subverted.</p>	173-16 cont.
#10	<p>Page 1-15</p> <p>1.7 Project Inconsistencies</p> <p>...</p>	<p><i>"The Proposed Project was reviewed for consistency with ..."</i></p> <ul style="list-style-type: none"> • City of Carlsbad General Plan • Airport Land Use Compatibility Plan for CRQ • City of Carlsbad Growth Management Plan • City of Carlsbad Habitat Management Plan <p>Please explain with this Plan's ignoring the terms and conditions of the City of Carlsbad's Ordinance 21.53.015 and CUP 172 how this section is correct.</p>	173-17
# 11	<p>Page 1-15</p> <p>1.8 List of Past, Present,</p>	<p><i>City of Carlsbad records were reviewed for development projects environmental documents within two miles of the airport...which are listed in Table 1-4 and shown in Figure 1-7.</i></p> <p><u>Past Projects within two miles:</u> - What happened to all the housing, schools, churches, playgrounds, recreational facilities, shopping centers, retirement and senior centers, etc. projects constructed over the last 30 years within two miles of the airport? There is no listing of them in Table 1-4. Please explain why not.</p> <p>Please NOTE Figure 1-7 is not labeled as Figure 1-7 in this PEIR. The result is the lay person has no idea where or even if this referenced table is included. Therefore, per the CEQA, this PEIR has to be reprocessed and rereleased with the timeframe for interested party starting over! When can we expect the PEIR to be rereleased????</p>	173-18
# 12	<p>Page 2-4</p> <p>McClellan-Palomar Airport Land Use Compatibility Plan</p>	<p><i>Airports ALUCP is to ensure compatibility...</i></p> <p>On page 2-9 in the Analysis section, it states The Airport has an ALUCP that was prepared under the direction of the San Diego County Regional Airport Authority. If so, the SCDRAA's ALUCP in section 2.12.1 definition describes a runway extension is an airport expansion! Therefore, the PEIR declaration that this is NOT an airport expansion because it is inside of the fence line of the property is <u>null and void</u>. Please explain why that is not so!</p>	173-19
# 13	<p>Page 2-8</p> <p>Operation</p>	<p><i>...There is no removal or substantial change to visual resources associated with the project...</i></p> <p>Based on all the work records from Caltrans, one of the most common parts of roadway construction is the removal of lead contaminated soil. Since this airport has been in operation since 1959 with mostly lead based fueled aircraft operations, it has to be concluded the soil in the</p>	173-20

		airport is contaminated by residual deposits of lead and will be required to be remove. Therefore, how is the above Plan statement factual?	↑ 173-20 cont.
# 14	Page 2-58 through 2-60 2.3.2 Analysis of Project Effects	<p>Not included in this section is the number of Schools, Churches, Nursing Homes, Playground, etc., are within two (2) miles of the airport .</p> <p>All of these are presently and will be greatly/SIGNIFICANTLY impacted by this Airport Expansion Project. Please Update with the correct number of facilities impacted.</p>	173-21
# 15	Page 2-61 2.3.2.1 Analysis Section	<p>The last paragraph states:</p> <p><i>"Lastly there are no schools or day care facilities located within one-quarter of a mile of the airport. The closest school is Pacific Ridge School which is located over 1.3 miles southeast of the Airport.... Therefore, operation of the proposed project is considered to be not significant with regards to accidental release of hazardous material near schools."</i> <u>Somebody did not do their homework.</u></p> <p>The above paragraph is a nice benign statement. BUT, the reality is people die every day as a result of plane crash in the U.S.A. And, as we all know, in the majority of aircraft crashes, fuel is always released. NOT stated in the County's above statement is over the last number of years, Pacific Ridge School routinely experiences a number of aborted landing (Go Arouns) over the school that luckily did not result in a disaster.</p>  <p><u>This incident was a Cessna 525C, but larger aircraft including the Gulfstream 650's have been recorded in similar incidents!</u></p> <p>As you can see from the above screenshot there are three schools with total population of over 2,200 students in attendance along with a large community park and a historical tourist park all within less than one and one-half (1.5) of a mile of the Airport!</p> <p>So far we have been extremely lucky, unlike the below neighborhood where a business jet lost control on approach and crashed into the neighborhood located 2.1 miles from the airport. The result was a mother, her two children and three others on the plane were killed.</p>	173-22


		 <p>Since CRQ's safety record from 2000 is thus far:</p> <ul style="list-style-type: none"> • 15 Fatalities • 19 Incidents <p>The PEIR must be updated to reflect the true facts. Once that happens the Plan need to be reissued.</p> <p>This section is Extremely Significant (Important)!</p>	173-22 cont.
# 16	Page 2-65 2.3.2.3 Analysis Section	<p>2nd Paragraph states:</p> <p><i>"As a component of the Mastpzer Plan Update, the Proposed Project would include shifting the runway north and extending the runway's east end. As such, the associated safety areas, including the RPZs would result in a corresponding shift. As part of the proposed improvements, land within RPZs should be secured at the earliest opportunity, but are not required to be secured prior to implementation of the Master Plan Update. Lands located within RPZs be sought overtime as opportunities arise. However, the marginal shift in RPZs would not render existing or approved land uses incompatible with an applicable ALUCP or constitute a hazard to aviation. The Airport Master Plan Update further describes how the Proposed Project would comply with FAA design standards and therefore, would not introduce new or increased safety hazards to people in the Airport vicinity. Therefore, the Proposed Project would not result in a significant airport hazard."</i></p> <p>After searching for a couple of hours for what "Mastpzer" meant, I concluded it had to be misspelled. BUT, my search brought up an interesting conclusion needing a answer from the County. That question is WHY this PEIR phase of the process should not be required to start over.</p> <p>In the public workshops, the public is told only one option of the possible options is to be considered - the preferred option. However, in the PEIR and DRAFT all options are described and none are in fact ruled out.</p> <p>Therefore, when the Master Plan is presented for approval to the Board of Supervisors all options will still be listed and once the Plan is approved --- ALL options will still be viable.</p> <p>If so and given the comment in the public workshop(s), the public has been mislead in this process. The public is most likely to only review the preferred option and be ignoring the other options in its review process.</p> <p>Please explain why the whole process is not required to begin all over with new directions all options are still viable in the future OR why the "not considered options" are not removed from the text?</p>	173-23

# 17	<p>Starting on Page 2-73</p> <p>The Whole Noise Section</p> <p>AND</p> <p>Appendix D</p>	<p>Unless I misread it, I did not see any reference to the projected increase of ambient dB(A) per hour as commercial passenger air traffic increases as the County's projections predict.</p> <p>Therefore, please see the following based on reading over the last three years at 330 ft 2.05 miles S-SE of the airport. The dB normal ambient reading without aircraft taking off in this area is 30 to 40 dB levels. With a large business jet that reading raises to 107 dB for 40 or so seconds until the aircraft gets out over the ocean coastline or more (coastline is 5 mile from the reading location) when the sound is not objectionable.</p>  <p>Business jets taking off from CRQ, 2.05 miles away. Noise reading is up to 107 db.</p> <p><u>However, when Cal Jet takes off the sound lasts up to 3 minutes.</u></p> <p>The following is what will be projected with 5 commercial jets landing or taking off per hour. This chart does not include the present day business traffic.</p>  <p>The below is an extended projection based on future County projections and enplanement projections.</p>
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173-24

173-26

		<p>... While the Airport Master Plan serves as a useful tool for planning and project funding purposes during a 20-year period, implementation of individual projects is dependent on available funding and current priorities....</p> <p><u>Caveat emptor:</u></p> <p>A neo-Latin phrase meaning "let the buyer beware." It is a principle of contract law in many jurisdictions that places the onus on the buyer to perform due diligence before making a purchase.</p> <p>The PEIR and Master Plan are void of any commitment to Commercial Airline Service, but in public statements by San Diego County Board of Supervisors and San Diego County Airport Authority personnel, both state the opposite and constantly support and project commercial service at CRQ.</p> <p>Given that fact and the above statement, this whole process is bordering on nothing but a "Bait and Switch" fabricated process and documents.</p> <p>Please explain why this plan is not all about commercial airline service coming to Palomar and why the public is not being deceived.</p>	173-26 cont.
# 20	Page 3-81 3.1.7.1 Existing Conditions	<p>Words Matter - 3.1.7.1 Existing Conditions second paragraph</p> <p>... The Airport has been owned and managed by the County since 1959. As it relates to the land use authority, depending on the development proposed, future private development at the Airport may be subject to discretionary review by the City of Carlsbad; however, the County maintains land use authority over public improvements such as the Airport. Typically, private development would be required to obtain building and grading permits from the City of Carlsbad and follow policies and ordinances where applicable.</p> <p>CUP 172 includes Table 1 that list what the airport can do without the need to get approval from Carlsbad or its VOTERS. In that table, the runway is not listed.</p> <p>Please explain, since the airport is proposing to extend the runway 200 to 800 feet, how that statement complies with Carlsbad Ordinance 21.53.015 and CUP 172 reference in the above wording.</p>	173-27
# 21	Page 3-84 3.1.7.1.2 State and Local Requirements	<p>Words Matter - 2nd Paragraph</p> <p>"The purpose of the Airport's ALUCP is to ensure compatibility between adjacent land uses and the operation and/or improvements to the Airport...."</p> <p>In the county owned land across from the airport is the Lowe's Shopping Center consisting of numerous restaurant and fast food buildings. Today, persons visiting this center are complaining about the soot and smell of jet fuel from jet aircraft sitting on the runway, taxiing or just warming up and going through the pre-flight check.</p>	173-28

		 <p>Please explain how the Master Plan projected increased 17,742 commercial passenger planes with 64 seats each and all the increased jet GHG and other jet exhaust pollutants produced is compatible to the restaurants and Lowe's customers directly across the street from the airport staging areas.</p>	173-28
# 22	Land Management General Question	<p>Not found in the PEIR or the MASTER PLAN is the fact the airport failed the EPA Lead Air Quality Testing release in 2013. CRQ is only one of two to fail the testing. However, within a year, San Carlos, the only other airport that failed the test, corrected the cause of why it failed the testing, but CRQ refused to correct the cause and hired its own consultants to try to prove the EPA test results were inaccurate. However, the consultants verified the EPA testing was correct.</p> <p>Please explain if CRQ now is in full compliance with the EPA testing and if not, why not.</p>	173-29
# 23	Page 3-86 Policy F-44	<p>Presently F-44 places a restriction on the number of passenger allowed as 70. However, when it was first passed that limit was 30.</p> <p>Given the Master Plan is projecting the runway will be extended to allow larger aircraft to use the airport, it must be assumed that passenger limit will be expanded to the number of maximum passengers for the critical planes of the future airport, e.g., Bombardier CS100 with maximum passengers 133.</p> <p>Please explain in detail the maximum critical commercial aircraft size and passenger load planned to be operating at Palomar for the next 20 years.</p>	173-30
# 24	Page 3-89 & 90 City of Carlsbad CUP 172 and Municipal Code 21.53.015	<p>Words matter and the description of CUP 172 and Ordinance 21.53.015 is extremely misleading and inaccurate.</p> <p><i>"The reference to the Airport in CUP-172 as a General Aviation Basic Transport Airport is an older weight-based classification that has become functionally obsolete as the FAA no longer uses this terminology or the methodology on which it was based to establish design criteria for airports. ..."</i></p> <p>In the Cup 172 and Ordinance descriptions in the PEIR, a lot of flowery words are used, BUT the description of the airport is incorrect. The</p>	173-31

		<p>correct description in CUP 172 is "General Aviation Basic Transport Airport" and the FAA still lists a "General Aviation Basic Transport Airport" as a viable airport description and one that is not obsolete, functional or otherwise.</p> <p>That said, if the airport classification were no longer valid, to change that classification description would require an amendment to CUP 172. Based on the County wording on Pages 3-89 and 90, that request seems to have not been made.</p> <p>Please provide the documentation that the County did apply and got approval to amend CUP 172 from Carlsbad's Planning Commission and in turn the Carlsbad voters to change the airports classification.</p>	173-31 cont.
# 25	Page 3-90 City of Carlsbad Municipals Code 21.53.015	<p><i>"Section 21.53.015 would only be applicable if the County were to expand the Airport beyond its current boundaries and a City legislative enactment or City expenditure in support of such an expansion were required."</i></p> <p>That sounds good but where did the yellow highlighted definition come from? According to SDCRAA ALUCP and California Airport Authority Code --- "a runway extension is an airport expansion."</p> <p>Please provide the legal documentation for justifying "only be applicable if the County were to expand the Airport beyond its current boundaries..."</p>	173-32
# 26	Page 3-92 City of Carlsbad 2nd Paragraph	<p><i>"As discussed above, Section 21.53.015 would only be applicable if the County were to expand the Airport beyond its current boundaries and a City legislative enactment or City expenditure in support of such an expansion were required. In developing the Airport Master Plan the County has voluntarily avoided any property acquisition to support the expansion of airport facilities beyond current property boundaries. There is no proposal to build a second runway or expand the existing runway outside of the existing Airport footprint."</i></p> <p>Both the PUC CUP and the SDRAA's ALUCP definition of a runway expansion states --- a runway extension is an airport expansion.</p> <p>Please explain why the County's definition of an airport expansion is not in compliance with the California PUC and the SDRAA's ALUCP definition of a runway expansion.</p>	173-33
# 27	Page 3-97 to 3-108 Schools, Parks, Buildings, Water, Storm Water, Solid Waste, Recreation,	<p>All throughout this section it reads the airport is not going to expand beyond it current boundaries: therefore, no anticipated need for increased police, fire, etc. BUT nowhere in this or any other section is there any mention of the increased GHG pollution and jet fuel soot or ground water contamination as a result of a possible major crash with tones of jet fuel spillage and fire of the heavier jets. Nor is there any information on the contamination caused by the addition millions of ground traffic and the gridlock that will be created. Fact - stop and go</p>	173-34

	etc,	<p>or idling traffic pollution is the worse. Nor is there any projection or concern expressed from the generated tons and tons of jet fuel soot that will settle in the surrounding communities around the airport by the airports increase air traffic.</p> <p>Please provide the projection of additional soot generated by the additional jet fuel by the additional 10's of thousands of jet aircraft projected by the new Master Plan.</p> <p>Please provide the contamination projection to ground water as a result of a serious large aircraft crash.</p> <p>Please provide the projection of GHG produced by the traffic gridlock caused around the airports projected increased in operations.</p>	173-34
# 28	<p>Page 4-1</p> <p>Chapter 4, 2nd paragraph</p>	<p><i>"Throughout the development of the Airport Master Plan Update, input was gathered at regular coordination meetings with the County, FAA, FBOs and stakeholders. In addition, four public workshops were conducted."</i></p> <p>According to the above statement, the public was not considered a stakeholder in the process. However, the public is the only one that will be negatively impacted by the FAA's projected 30% property value loss and increase health issues and loss of a healthy lifestyle when this Master Plan is implemented. The public is the one through its taxes who will be funding this project.</p> <p>FACT - Congress funds the FAA with taxpayers dollars and the airline industry funds the shortfall with money from the airline ticket surcharges paid, ALL PAID FOR by the taxpayers.</p> <p>Please Explain why the public was not considered a stakeholder in this process.</p>	173-35
# 29	Cannot find information	<p>Where is the Cost benefit statistics? Where are the statistics comparing FAA projections on property values drop around growing airports?</p> <p>Please provide the details on cost benefit verses losses in property values and the resulting drop in property tax, etc.</p>	173-36
# 30	<p>Page 4-2</p> <p>4.1.2.1 Relocate Airport</p>	<p><i>"This alternative considered relocating the Airport to an alternate location or transferring commercial services to another airport. As the only other commercial air service airport in San Diego County alongside San Diego International Airport, the closure of McClellan-Palomar Airport would create a passenger service deficiency and the County could violate its Airport Grant Assurances with the FAA. Forcing commercial passengers, general aviation pilots, and corporate users to other airports rather than their preferred origin or destination airport would result in negative system-wide surface transportation impacts, including increases in VMT, increases in related air pollutant emissions, and the loss of convenient air transportation services for North County residents and businesses. Existing airport businesses are under long-term tenant leases, some up to 50 years, and the County would have to</i></p>	173-37

		<p><i>negotiate termination of the agreements. Corporate and charter air services would be forced to relocate and install new infrastructure. Relocating the airport to an alternate location or transferring services to another airport fails to meet any of the project objectives as outlined in Section 1.1 and was not considered further."</i></p> <p>Please explain why the highlighted sentences are good for the 225,000 citizens, as claimed by the airport as the population impacted by CRQ, and why the few businesses that would be impacted by a relocation outweighs any consideration for the 225,000 citizens. 225,000 citizens whose County property tax dollars (per the FAA) will be greatly reduced, not including the increase health cost to that population from the airports greatly increased pollution, both noise and greenhouse gasses. Bottom line, it is estimated the COUNTY will lose approximately a Billion dollars in property tax revenue and greatly increased health care requirements and cost as a result of this Plan.</p> <p>Please Explain how this make good fiscal policy.</p>	173-37 cont.
# 31	Page 4-4 4.2.2.5	<p><i>"As discussed in the Airport Master Plan Update and this PEIR, the forecasted increase in vehicle trips to and from the Airport is anticipated to occur regardless of whether or not the Proposed Project is constructed. Traffic associated with the Airport is expected to increase over time even under the No Project Alternative, and the areas of LOS deficiencies identified would need to be addressed as discussed by the City of Carlsbad's General Plan Mobility Element. The Airport Master Plan Update discusses a range of potential commercial air service use at the airport based on long-term forecasts and the PEIR considers its potential impact to traffic. With the No Project Alternative, commercial service would continue to operate at the airport, but in the absence of a cohesive long-term planning document to identify operational efficiencies. Under the No Project Alternative, traffic impacts and mitigation would be addressed incrementally and on an individual basis, but would not result in a substantial advantage in terms of impact avoidance."</i></p> <p>We have to assume the above is all true, but traffic mitigation would be a lot less if the airport is not expanded to accommodate 550,000 enplanements and correspondent number (550,000) of deplanements by 2024 as the Master Plan surprisingly did not mention.</p> <p>Per the Master Plan Draft in the Transportation Impact Analysis, on Page 25 it states "2.67 daily trips per enplanement" is required, therefore, without the extra approximately 6,062,481 vehicle trips per year Carlsbad's traffic mitigation would be a lot less costly.</p> <p>Please explain in detail why Carlsbad and its citizens would not benefit from the reduced traffic in the future a No Change Project would allow.</p> <p>Page 4-4 - 4.2.2.5 Continued.</p> <p>In the above traffic projections there are no accounting for enplanements and deplanements of passengers served by the private aircraft that make up the majority of the airports operation per year.</p>	173-38

		<p>Please explain in detail why that information is not included.</p> <p>Please explain in detail the next 20 years projected increase of the private passengers being planned in this Plan.</p>	<p>↑</p> <p>173-38 cont.</p>
# 32	<p>Page 4-6</p> <p>4.3.2.5 Transportation and Traffic</p>	<p>"As discussed in the Master Plan Update and this PEIR, the forecasted increase in vehicle trips to and from the Airport is anticipated to occur regardless of whether or not the Proposed Project is constructed. As such, the B-II Enhanced Alternative is anticipated to result in the same number of enplanements as compared to the PAL 1 and PAL 2 scenarios analyzed under the Proposed Project. Consequently, the B-II Enhanced Alternative would generate the same number of vehicle trips and result in the same impacts to the existing circulation network as those identified under the Proposed Project. Therefore, the B-II Enhanced Alternative would not result in a substantial advantage in terms of impact avoidance."</p> <p>Please explain in detail how the highlighted text can possibly be correct. B-II aircraft carry less passengers than D-III, consequently less vehicles required to support the reduce number of passengers.</p>	<p>173-39</p>
# 33	<p>Lastly regarding the whole PEIR and Master Plan Draft</p>	<p>This whole PEIR and MASTER PLAN explains why the airport must expand, but it does not address the fact that the County has completely misrepresented the reason and mismanaged the airport. Additionally, it could be easily stated, the County colluded with and encouraged the operators of the C-III and D-III aircraft to continue using the B-II airport to build this false narrative.</p> <p>That said, I agree, the airport cannot stop any plane from landing at this B-II airport. BUT, and this is a BIG BUT, the County, as manager of a B-II airport, has the fiduciary responsibility to not encourage the C-III and D-III aircraft to routinely and continually use the B-II airport.</p> <p>The airport is and has been a FAA Certified B-II airport for 30 or so years. As such the County is responsible to manage a B-II airport period. The County should NOT be encourage and/or entice operators of larger aircraft to continually use Palomar. Based on the C-III and D-III aircraft presently housed at the airport, this is what the County has done. Therefore, this whole PEIR and Master Plan is nothing but a "bait and switch", ponzi or pyramid scheme designed to convince the taxpaying public to buy in.</p> <p>Definition of Ponzi and Pyramid Scheme: Pyramid and Ponzi schemes share many similar characteristics in which unsuspecting individuals are fooled by unscrupulous investors who promise extraordinary returns.</p> <p>In this case the unsuspecting individuals are the Public. The County promises commercial airlines will be coming, but has purposely under estimated the potential of an airport with a 5697 ft. runway and <u>states this expansion is strictly for safety</u>. Therefore, the County is hiding the fact that if the public buys in it will be bombarded by larger and larger</p>	<p>173-40</p> <p>173-41</p> <p>↓</p>

		<p>jets carrying more and more passengers. Not to mention the massive increase in greenhouse gas and noise pollution the public will be forced to breath.</p> <p>Bottom line - while it's true the airport will be safer, the B-II class of aircraft the airport is certified for do not need the additional runway length for operate safely.</p> <p>To say as the Plan misrepresents ---because ONE jet per week needs to fly to China, but has to stop at SAN to top off is not a valid reason to spend millions on the airport.</p> <p>Please explain in detail why the County has not mismanaged a Class B-II airport and purposely created a false narrative for public consumption.</p>	I73-41 cont.
# 34	General Observation on Health Issues	<p>There does not seem to be any information on health issues caused by growing airports and the increased larger and larger aircraft GHG pollution and Noise pollution.</p> <p>Please explain in detail why there is no information on the proven health issues from airports and aircraft GHG and Noise.</p>	I73-42
# 35	General Observation	<p><u>Please supply a detailed answer:</u></p> <p>With the fast changing transportation options now under construction, why is the County looking to spend \$100 million or much, much more on a highly polluting option rather than the cleaner and more cost effective options now available?</p>	I73-43

McClellan-Palomar Master-Plan-Update 2018 DRAFT		
Item # Continued from PEIR	Master Plan DRAFT Page # & Section #	Master Plan Update 2018 DRAFT Comment Question
# 36	Page ES-1	<p>Overview - Paragraph 2</p> <p><i>"The Airport serves as a gateway to world-class resorts and tourist attractions ...".</i></p> <p>As such you only have to look at any airport in the world to see how the surrounding communities have been negatively impacted and why this planned airport expansion is not compatible with Carlsbad as it exists today.</p> <p>When was the last time you elected to vacation at a <i>"world-class resorts and tourist attractions"</i> directly under an airport's takeoff path with all the noise, jet exhaust soot and pollution?</p> <p>In fact, when LAX expanded, it removed all residences and business directly under the takeoff path.</p> <p>I do not see any consideration to do the same for Carlsbad in this Plan.</p> <p>Please explain why the 2018 Master Plan Draft will not forever destroy Carlsbad property values, citizen health, children's ability to learn, and Carlsbad's overall quality of life.</p>
# 37	Page ES-1	<p>Overview - Paragraph 2</p> <p><i>"Economic activities related to the Airport generate hundreds and millions of dollars of income and revenue for the surrounding local communities."</i></p> <p>Please identify actual accounting for the above statement, e.g., how many of the statistics already exist and what addition statistics will be created by the Plan. Additionally with the FAA's report on actual property values depreciation as a result of airport expansion and the increase noise it causes, please provide how the billions of dollars the FAA report projects for devaluing property values offsets the cost to expanding the airport and creating relatively few jobs in the immediate surrounding airport communities.</p>
# 38	Page ES-1	<p>Overview - Paragraph 3</p> <p><i>"The County of San Diego has prepared a comprehensive McClellan-Palomar Airport Master Plan Update (Airport Master Plan Update) to plan for the future while enhancing operations and safety at the Airport. Many options were developed and considered as the Airport Master Plan Update was prepared."</i></p> <p>The above highlighted statement brings up one important question.</p> <p>In 2015 the FAA Part 150 mandated taxiway and runway centerline to</p>

I73-44

I73-45

I73-46

		<p>centerline must be 400 ft. separation for C/D-III aircraft, but Palomar separation is only 297 ft.. However, C/D-III aircraft are still projected to routinely be using the airport for the next 13 or so years without the safe separation required by the FAA for these larger jets.</p> <p>~ <u>Is and has the County failed as a responsible property manager?</u> ~</p> <p>Is the County putting the wishes of the business community ahead of the safety of the County's own citizens?</p> <p>Please Explain in Detail why the above two questions are not correct and why the County is not in violation of its duty to its citizens who have been negatively impacted by the County's mismanagement.</p>	173-46 cont.
# 39	Page ES-1	<p>Overview - Paragraph 7</p> <p><i>"Extend the runway, possibly in phases, increasing the length by 200 to 800 feet for a maximum of 5,700 feet."</i></p> <p>Based on the Plan's three (3) phases, it will take 13 years before the runway will be extended and meet the FAA mandate for centerline separation.</p> <p>Lastly, according to the Plan, one of the main reasons for the runway extension is to allow G650 or larger business jets to fly to China nonstop.</p> <p>Please explain how the highlighted "possibly in phases" can possibly be true given the 2015 FAA 400 ft. taxiway to runway centerline separation mandate.</p> <p>Please explain how not upgrading to allow C/D-III aircraft will not be happening for at least 13 to 20 years can possibly be believable or why Qualcomm will wait for the longer runway before it takes action to resolve the issue.</p>	173-47
# 40	Page ES-1	<p>Overview - Paragraph 8 -3rd Sentence</p> <p><i>"Even if every project in the Airport Master Plan Update is completed McClellan-Palomar Airport would not be able to handle the size or volume of aircraft, or number of passengers, as San Diego International or John Wayne Airport."</i></p> <p>It goes without saying Palomar's numbers will be smaller, but given the last County's Catchment Area numbers, exceeded more than 4 million enplaning passengers and SAN has projected starting in 2025 it could possibly <u>not</u> accommodate up to 3 million passages.</p> <p>It is nice to make the above County quoted blanket statement, but with the County's projections of future passenger shortfalls, the County's "Even if ..." statement is simply not believable.</p>	173-48

		<p>That said, it goes a long way to prove the County management personnel are incompetent managers or simply not presenting the true facts.</p> <p>Please provide the County's audited numbers for the actual projected numbers for Palomar terminal throughput numbers for the next 20 years.</p>	↑ I73-48 cont.
# 41	ES-2	<p>Last sentence in Paragraph 1</p> <p><i>"The Airport Master Plan Update does not include any plans for more than 575,000 annual departing passengers."</i></p> <p>Given SAN's and the FAA's projections for air travel increases in the next 10 years, how this statement can possibly be correct.</p> <p>Please provide WHY this Plan is ignoring the FAA projections for dramatic air traffic increases for the next 20 years?</p>	I73-49
# 42	ES-3	<p>First paragraph</p> <p><i>"Airport master plans are periodically updated to support the maintenance, development, and modernization of airports, as well as to plan for construction needed to accommodate future demand for aviation services on a local, regional, and national basis."</i></p> <p>A true statement, but ignores all the relevant facts and Carlsbad LAW. In 1980 Carlsbad passed Ordinance 21.53.015 and CUP 172 giving Carlsbad zoning rights to prevent the airport from expanding. For 38 years the County of San Diego has recognized those rights and submitted addendums to CUP as needed.</p> <p>That said, in the County's January Workshop on the new Master Plan, the County stated it was compliant with Carlsbad LAW and will not submit an addendum to change CUP 172.</p> <p>This brings us to the crux of the matter - <i>"Airport master plans are periodically updated to support..."</i> the 1980 Carlsbad LAW left no doubt before Palomar could expand it required a VOTE of Carlsbad citizens. That LAW was further define in 1984 Resolutions and the County one more time did not object.</p> <p>Please explain in detail why after 38 year, including earlier this year, the County admitted in writing Carlsbad's LAW is valid and requires a majority vote of the Carlsbad electorate before the runway can be extended.</p>	I73-50
# 43	ES-3	<p>Paragraph 4</p> <p><i>"The Airport Master Plan Update was started in early 2014 and to date has included numerous public outreach efforts. As the master plan process moved forward it became clear that there were several leading options to be considered as the preferred alternative for the</i></p>	I73-51 ↓

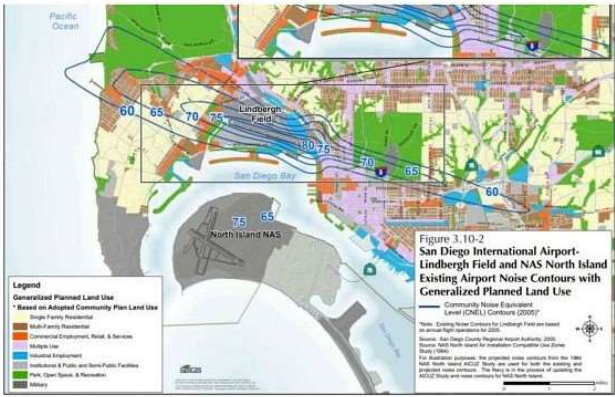
		<p><i>future classification of the Airport. Three options were presented for the Board's consideration on December 16, 2015. The Board directed staff to proceed with the Airport Master Plan focusing on the modified C/D-III classification as the preferred option,..."</i></p> <p>During that meeting the Board was presented with the " <i>the preferred alternative</i> " as overwhelmingly the option voted as a result of the <i>public outreach efforts</i>.</p> <p>Please supply the details of:</p> <ol style="list-style-type: none"> 1. How many were at the public meetings 2. How many were at the business community group meetings. 3. The vote by the attendants of the Public Workshops 4. The vote by the attendants of the business community group meetings 5. Total numbers of Public and business community group workshops attendances 6. The number of the votes for each option compared to the number of attendances of the total Workshops. 7. A complete breakdown of the votes of the business community group workshops 	<p>↑</p> <p>I73-51 cont.</p>
# 44	ES-3	<p>Master Plan Purpose - First paragraph - First sentence</p> <p><i>"The purpose of a Master Plan Update is to provide a developmental framework that meets existing and future aviation demand in a safe and cost-effective manner."</i></p> <p>Please explain in detail how the proposed Master Plan broken into three (3) phases will be cost-effective. Base on the three phases it would be at least 13 years before any accommodation will be made for the larger jets needing to fly to China. Therefore and along with the wording in the Master Plan (already partially identified), it must be interpreted this Master Plan is a "Bait and Switch" effort by the County and is not compliant with California LAW.</p> <p>Please provide detailed justification for not providing a Master Plan that is not in compliance with California LAW.</p>	<p>I73-52</p>
# 45	ES-3	<p>Master Plan Purpose - First paragraph - Last sentence</p> <p><i>"Public involvement and environmental review are also very important in developing a Master Plan Update that meets the needs of the community."</i></p> <p>After reading the Master Plan, I did not see any projections for the airport surrounding communities increase or decrease in property values.</p>	<p>I73-53</p> <p>↓</p>

		<p>Please explain in detail the projection for surrounding communities property value increase or decrease as a result of this plan. This projection must also include the FAA statistics on expected property value as airport noise increases.</p>	↑ 173-53 cont.
# 46	ES-3	<p>Master Plan Purpose - Paragraph Two - First sentence</p> <p><i>"The new Master Plan Update considers the runway design elements in the context of other long-term facility improvements. ..."</i></p> <p>This sentence and the remaining text in this section completely ignores the public property owners in the airport's surrounding communities. It assumes the only input that is relevant are the airport businesses or the business community located outside of Carlsbad.</p> <p>Please explaining why this Plan is not premature without first getting the approval of the majority of the Carlsbad electorate, as Carlsbad LAW dictates and the County agreed to comply in 1980.</p>	173-54
# 47	ES-3	<p>Public Involvement</p> <p>This whole section can be interrelated at best as government officials who have no idea what an accurate public consensus actually means.</p> <p>According to the 2016 population numbers, Carlsbad had a population of 113,952. When the surrounding communities of Encinitas, Escondido, Oceanside, San Marcos, Vista and Valley Center are included, that population number grows to 589,096.</p> <p>Based on the outcry around the <u>world</u> with the implementation of the FAA's NexGEN and the FAA California implementation of the NextGEN's Metroplex system --- ALL of the 589,096 population will be negatively impacted by the expansion of Palomar into a "BIG Commercial Enterprise" as stated by Supervisor Bill Horn in 2015, 2016, and 2017.</p> <p>Please explain how sending out approximately 2,500 email notifications (to people who happened to find out about the proposed Plan) and publicizing workshop dates in local news papers (that are mostly no longer read), justifies not contacting the 586,096 citizens of North County. Citizens, who's life and property values are about to be negatively impacted by the expansion of Palomar.</p> <p>FYI 2,500 = only .004655% of San Diego North County residents. WOW, talk about a covert plan and what can easily be called irresponsible and possibly immoral effort!</p> <p>Using the County experts analogy, the population of the U. S. would ONLY be 1,493,115, NOT the actual 323,100,000 recorded in the last</p>	173-55

		U. S. census. Since the County has all mailing addresses on file, Please explain why the County did not contact ALL the citizens of North County who will be impacted by this airport expansion.	↑ 173-55 cont.
# 48	ES-3	Public Involvement <i>"There have also been multiple Palomar Airport Advisory Committee meetings that included Airport Master Plan items on the agenda."</i> This statement sounds good, but it is meaningless verbiage that never expands on the fact that the PAAC is likely to have 2 or less public attendants at every meeting. WHY? Over the years the PAAC has tolerated public participation and berated or ignored 100% of public input. Other than checking a box for compliance Please explain how this statement is relevant and truthful.	173-56
# 49	ES-3	Public Involvement <i>"Many comment cards, surveys, and emails regarding the Airport Master Plan have been received, reviewed, and responded to."</i> Please provide a detailed list of all responses to: 1. The comment cards and the responses 2. The surveys and the results 3. The emails	173-57
# 50	ES-3	Public Involvement <i>"There have been meetings with stakeholder groups, comprised of tenant, industry, and local and federal agency representatives."</i> Please provide a list of ALL these companies and/or individuals, including the dates and content of ALL meetings. Please provide why the public is and was not included in these stakeholder meetings.	173-58
# 51	ES-4	Public Involvement - First sentence <i>"There was coordination with Federal Aviation Administration and neighboring cities of Carlsbad, San Marcos, and Vista."</i> Please provide a detailed list of ALL of these companies and/or individuals, including the dates and contents of ALL meetings.	173-59
# 52	ES-4	Public Involvement - Paragraph 2 <i>"There were opportunities for the public to learn more about the Airport Master Plan and give input regarding impacts during the preparation of</i>	173-60 ↓

		<p><i>the Program Environmental Impact Report."</i></p> <p>Please provide a detailed list of all public input as a result of these opportunities.</p>	173-60 cont.
# 53	ES-6	<p>Airport Classifications - Paragraph 1 - Last Two Sentences</p> <p><i>"The current ARC for McClellan-Palomar Airport is a B-II code which represents a mid-sized business jet. However, a substantial number of larger jets currently use the Airport and it's expected these aircraft will continue to use the Airport."</i></p> <p>Based on the above verbiage and the County is the sole property manager, as such:</p> <ol style="list-style-type: none"> 1. Please explain in detail how the highlighted area above is relevant. 2. Please explain in detail how as managers of the airport, the County did not prevent the above highlighted sentence from happening by implementing penalties for B-III, C and D aircraft who routinely use Palomar. 	173-61
# 54	ES-6	<p>Airport Classifications - Paragraph 2 - First Sentences</p> <p><i>"The Airport currently meets all B-II design criteria as designated in the previous 1997 Master Plan. However, the 1997 Master Plan did predict a future shift to larger C/D-III sized aircraft."</i></p> <p>Please explain in detail:</p> <ol style="list-style-type: none"> 1. When did the County decide to ignore its responsibility to properly manage the B-II airport by allowing B-III, C and D aircraft to routinely use the airport even though the runway to taxiway centerline separation was not compliant with FAA standards? 2. Who attended the meetings with the surrounding cities when the County informed their officials that was the County's future plan and the airport would be expanding? 3. The dates of those meetings? 4. Is it the County's position --- since the 1997 Master Plan predicted a future shift to larger C/D-III size aircraft that is all the County needs to justifying allowing the C/D-III aircraft to routinely us the Carlsbad City approved B-II airport? 5. Is it the County's position --- if it is predicted in this new Master Plan, that gives the County the authority to implement the prediction and not comply with Carlsbad and apply for an amendment to CUP 172? 	173-62

# 55	ES-7	<p>Preferred Airfield Alternative - D-III ...</p> <p>Please provide the detailed documentation of the Public vote on this Option.</p> <p>Please provide the detailed documentation of all others vote on this Option.</p>	173-63
# 56	ES-9	<p>Runway Extension - Paragraph 3</p> <p><i>"Larger corporate aircraft often stop and refuel at nearby airports with longer runways such as San Diego International Airport in order to reach their destination. This poses a significant inconvenience to operators, leads to lower fuel sales at CRQ, and increases the amount of fuel aircraft consume and emissions released into the environment."</i></p> <p>If the aircraft stopping to refuel is inconvenience for the aircraft owner and causing it to produces a lot more pollution --- why is it housed at the County owned Palomar? It simply is not a Palomar issue and cannot be used as a justification to expand the Design Class B-II airport.</p> <p>What is the issue ----WHY is the County allowing this to happen? By allowing the aircraft to rent a hangar at Palomar, the County is rewarding this polluter rather than penalizing the polluter.</p> <p>Please explain in detail why this is not another example of San Diego County mismanaging of the Airport, the Master Plan is full of fabrications to expand the airport and in turn will negatively impact the health of North County's citizens. The citizens the County has a fiduciary responsibility to protect.</p>	173-64
# 57	ES-9 & ES-10	<p>Both these pages completely ignore Carlsbad LAW.</p> <p>Please explain in detail how Carlsbad LAW does not apply before any expansion can take place.</p>	173-65
# 58	ES -11	<p>Long-Term (+/- 13-20 years)</p> <p>Nowhere in that Project Plan TO DO's is a budget for removing the landfill OR driving the proposed pilings through an unlined landfill.</p> <p>Please explain in detail</p> <p>The cost involved in that project including the cost to protect the Carlsbad's Aquifer.</p>	173-66
# 59	ES-12	<p>Board Policy F-44</p> <p>Statistically over the last three years, Palomar has received noise complaints from the surrounding population that Palomar aircraft</p>	173-67

		<p>noise has impacted over 1 million people.</p> <p>F-44 is not working. Please provide details on how Palomar and the County will resolve this issue.</p>	173-67 cont.
# 60	ES-12	<p>Noise</p> <p>With the planned conversion from a small airport into a "BIG Commercial Operation" airport, how is this section relative to what will be?</p> <p>As the Master Plan states, the mix of aircraft will change greatly in the future and the Airport throughput will be well over 1 million passengers.</p> <p>Why is there no additional noise impact reflecting that fact?</p> <p>With the aircraft shifting to mostly C/D-III Business and Commercial Jets the noise couter should be more like today's SAN or SNA noise map --- - <u>BUT</u> much worse since both have curfews in place, CRQ will be 7/24.</p>  <p>Please explain in detail with the type of operations planned why:</p> <ol style="list-style-type: none"> 1. The present Master Plan's Noise Contour Map for Palomar is correct. 2. Palomar annual Noise Complaints will not grow to over 40,000 - just like SAN. 	173-68
# 61	Page 2-16	<p>VNAP has <u>not worked</u> since it was implemented. The key word in VNAP is "Voluntary" But, unlike at other airports around the country, Palomar's VNAP has no enforcement or penalties for pilots who ignore the VNAP procedures.</p> <p>To find the truth you need go no further than checking the monthly noise complaints or ask the PAAC what it does with the noise complaints and you will find the answer to be - Nothing.</p> <p>Please explain in detail what plans will be in place to enforce a VNAP policy if the Plan is implemented.</p>	173-69

# 62	Page 2-25	<p>Table 2.6 -2016 CRQ Area Traffic Count Data</p> <p>In the Master Plan and The Public Master Plan Meetings, other than a blanket statement that Carlsbad would receive monies to mitigate the increase traffic created by the Master Plan, there was no additional explanation.</p> <p>Please provide detail information how the County plans to control the additional 16,000 plus commercial daily traffic trips (not including the private passenger daily trips) on its airport owned property created by the projected throughput passengers.</p>	173-71
# 63	Page 2-35	<p>Zoning - Paragraph 2</p> <p><i>"In response to a proposal to expand the Airport to the north to add an additional runway, Carlsbad residents proposed an initiative in 1980 to require voter approval of any expansion of the Airport, which is defined as expanding beyond the current boundaries as outlined in CUP-172. The City adopted Ordinance No. 9558 in 1980 adding Section 21.53.015 to the City's Municipal Code."</i></p> <p>Please explain in detail why the above definition is correct. This definition does not exist in CUP 172.</p>	
# 64	Page 2-37	<p>Zoning - Paragraph 4</p> <p><i>"Proposed facility changes identified in the Airport Master Plan Update such as the relocation and extension of the runway, as well as forecasts of aviation activity would likely result in SDCRAA needing to amend the compatibility plan for the Airport. Changes to the compatibility plan could result in the City having to modify or amend its General Plan and other land use regulations. Additionally, any facility expansions" as defined by State of California Public Utilities Code § 21664.5 (e.g., the extension or realignment of a runway) will require the Airport to amend the Airport's State permit. It should be noted that this definition of expansion only applies as it pertains to the perspective of the State."</i></p> <p>Please explain in detail with the above definition and Carlsbad <u>purposeful removal of the runway</u> (twice) from the approved CUP's Table 1, how the County can claim the runway extension is not an airport expansion.</p>	173-72
# 65	Page 2-44	<p>POLICY F-44 "DEVELOPMENT OF MCCLELLAN-PALOMAR AIRPORT"</p> <p><i>"The purpose of this policy was to guide future development at the airport. The new McClellan-Palomar Airport Master Plan lays out a new comprehensive 20-year plan for development of the Airport, making Board Policy F-44 Development of McClellan-Palomar Airport duplicative. The Master Plan also details the County's relationship to other agencies relating to airport operation and development. The commitment to continue to implement a noise abatement program and monitoring program, as detailed in the Board Policy is also is also contained in Section 2.11.2 "Noise" of this Master Plan. For these reasons following</i></p>	173-73

		<p><i>adoption of the McClellan-Palomar Airport Master Plan the Board of Supervisors may determine Board Policy F-44 is no longer needed and repeal it."</i></p> <p>The whole FAA/County noise abatement and monitoring programs are no more than a "wink and nod" agreement between the County and the FAA.</p> <p>Surely with the above Master Plan statement is not just words, but is backed up by planned action.</p> <p>Please explain in detail what commitment and monitoring improvements will be made.</p>	173-73 cont.
# 66	Page 2-48	<p>2.11.2 Noise</p> <p>This whole section is words without substance or proven compliance with community complaints.</p> <p>Please Explain in Detail with the increasing community noise complaints and C/D-III aircraft using Palomar, why this section is not additional proof of County mismanagement of the airport. The airport is only FAA certified as a Design Class B-II Airport. As such any plane can land, but once landed it becomes the responsibility of the airport to impose restrictions and penalties if the C/D-III aircraft operations becomes routine or a permanent clients of the airport.</p> <p>Please Explain in Detail why the County (the owner and manager of the airport) is not upholding its fiduciary responsibility to comply with Carlsbad LAW.</p> <p>Please Explain in Detail why the County is not restricting C/D-III operations by imposing penalties for repeat violators. Thus allowing the B-II airport to NOT comply with its fiduciary reasonability to protect the airport surrounding communities.</p>	173-74
# 67	Page 3.1	<p>3.1 Preamble - Paragraph 2</p> <p><i>"... The justification for development of alternative scenarios for planning purposes is supported by the return of commercial service at CRQ in September 2017 as well as other prospective airlines planning commercial service operations at the Airport...."</i></p> <p>In order to properly evaluate this Plan, please supply a complete list of ALL "other prospective airlines planning commercial service operations" carriers. Without that list this Master Plan cannot be evaluated and therefore will need to be reissued for public comment.</p>	173-75
# 68	Page 3-1	<p>3.2 Introduction - Paragraph 3</p>	173-76

		<p><i>"Actual activity that is achieved in future years may differ from the forecasts developed in this planning document because of future changes in local conditions, dynamics of the airline and general aviation industries, and economic and political changes for the local area and nation as a whole."</i></p> <p>Given the reality of the County's responsibility to not negatively impact the lives of its more than 500,000 citizens, this statement is appropo and verifies the County cannot predict the future. As such, it should uphold the LAW and its only responsibility to its citizens is to manage a Design Class B-II airport as was approved by Carlsbad in 1980. If the citizens want to allow the airport to grow, it is up to the County to get a majority vote of Carlsbad citizens before any monies are spent on any study to upgrade the airport.</p> <p>Please explain in detail why the County (the owner of the airport) is not complying with the LAW and WHY it is actively attempting to jeopardize the property values of airport surrounding community as has been validated in the well respected FAA property devaluation report.</p> <p>Please explain in detail why there are no FAA projections of property value devaluation in the Master Plan.</p>	173-76 cont.
# 69	Page 3-3	<p>3.3.1 Commercial Airport Service Area</p> <p><i>"... and Carlsbad, while also being within the section of the County of San Diego with the highest median family income level...."</i></p> <p>You got to be kidding me, the County feels this is the place to expand a small citizen approved Design Class B-II airport into a "BIG major commercial airport."</p> <p>Based on the FAA's <u>average</u> 18.6% property valuation devaluation study and Orange County Board of Supervisors <u>average</u> 27.6% property devaluation study for communities with higher value homes, how can the County possibly justify this Airport Expansion Plan directly in the middle of <i>"the highest median family income level"</i> community?</p> <p>Please Provide in detail the accounting that justifies this planned airport expansion, including the study used for a detail breakdown of the so called job creation numbers being quoted in the Public Workshops abd City Council meetings.</p>	173-77
# 70	Page 3.15	<p>3.5.4 Aircraft Operations - Paragraph 2</p> <p><i>"It should be noted that in subsequent Section 3.10.3, by 2031 it is anticipated that aircraft with a D-III ARCs will conduct more than 500 annual operations, which is the FAA's threshold for critical design aircraft determination. This means that in the future, Airport facilities should be</i></p>	173-78

		<p><i>designed and constructed to accommodate ARC D-III aircraft."</i></p> <p>The above quote is all well and good, but what does it have to do with managing a Design Class B-II Airport. Until the County is given permission by the voters to expand the airport, the County's responsibility is to uphold the LAW and the will of the people. The people spoke in 1980 and stated the runway is not to be extended period.</p> <p>Please explain in detail why the County is not managing the airport:</p> <ol style="list-style-type: none"> 1. To the LAW 2. Wishes of the citizens 3. Has ignored the LAW 4. Extended the runway in 2000 from 4700 ft. to the current 4897 ft. without Carlsbad voter approval 	173-78 cont.
# 71	Pages 3-24, 3-25, 3-26 and 3-27	<p>3.8 Based Aircraft Forecast , 3.8.1 Base Airfield Fleet Mix, 3.9 Aircraft Operations Forecast, 3.9.1 Air carrier Operations Forecast and 3.9.2 Air Taxi/Commuter Operations Forecast</p> <p>This whole section emphasizes the question is the County mismanaging the airport.</p> <p>The County has no authority from the citizens to expand the airport and its services without a majority vote of the citizens of Carlsbad. Consequently, the County seems to have overstepped its authority and is mismanaging the airport.</p> <p>Please explain why the above mismanagement statement is not correct.</p>	173-79
# 72	Pages 3-32 Thru 3-38	<p>Page 3-32:</p> <p><i>"To estimate design hour enplanements for CRQ, the following assumptions were used:</i></p> <ul style="list-style-type: none"> <input type="checkbox"/> <i>Annual Commercial Departures are utilized from Section 3.7.</i> <input type="checkbox"/> <i>Commercial flights in the future will use a fleet of 19-seat, 30-seat, and up to 70-seat aircraft."</i> <p>Page 3-33:</p> <p><i>"With the understanding that the Airport's timing and tempo limits may remain in place throughout the 20-year planning period, design hour enplanements are generated by incorporating the largest type of aircraft anticipated to be in operation (70 seats) and applying a realistic passenger load factor during busy periods that could occur on a semi-regular basis (90 percent). This application results in 63 design-hour passengers."</i></p> <p>The two above statement are already out of date.</p>	173-80

		<p>Why? The Bombardier CS100 -134 passenger (already on the market) and the Mitsubishi RJ 70 -76 passenger (soon to be on the market).</p> <p>Both these planes make the above Master Plan statements obsolete , if not the entire Master Plan.</p> <p>Why? <u>They both require less than 4800 ft runway to operate at MTOW.</u></p> <p>Please explain in detail why the above facts do not make the new Master Plan obsolete and why it should not be completely rewritten to include the reality of the now changing regional airport requirements and then be reissued.</p> <p>FACT - the changes are happening now and not 20 years from now.</p>	↑
# 73	Page 4-12 and 4-13	<p>4.4.2.1 Runway Length</p> <p><i>"Runway length of 5,800 feet. "</i></p> <p>Page ES-1</p> <p><i>"The Airport Master Plan Update divides the projects into 3 phases; Near-term (0-7 years), Intermediate term (8-12 years), and Long-term (13-20 years)."</i></p> <p>Page ES-11 details All 3 Phases</p> <p>Given this plan's 800 feet extension is not scheduled to be constructed 13 to 20 years in the future, it has to be asked ---- what is the rush?</p> <p>Please explain in detail why there is the rush to waste taxpayer's money. Especially when the regional commuter aircraft <u>are already operating</u> on Palomar's 4897 ft. runway with no issue.</p> <p>Please explain in detail why the County is wasting taxpayers' money when according to the County's Public presentations ONLY one business jet (QUALCOMM's G650) has to stop at SAN to top off its tanks before flying to China once a week.</p> <p>Please explain in detail why 259,000 taxpayers have to have their Quality of Life, Health, Children's Education and so much more negatively impacted for ONE jet owner who is inconvenienced.</p> <p>Please explain in detail why the County is not properly managing a voter approved FAA Design Class B-II Airport and not encouraging B-III, C and D aircraft to move to airports certified for those aircraft to operate.</p> <p>Please explain in detail why this whole Master Plan with the</p>	↓

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173-81

		above inconsistencies (not only in this section, but all throughout the Master Plan) why the Public should not consider this is nothing but a "Bait and Switch" con.
# 74	Page 4-13	<p>Paragraph 1 under the Table 4.10</p> <p><i>"Based on the runway length requirements of several different types of aircraft shown above, the existing length is adequate for most aircraft when operating at reduced loads, including the CRJ-700, which currently provides scheduled commercial service. However, takeoffs at maximum takeoff weight (MTOW) or even 75 percent of MTOW are not possible for several mid-to-large size corporate and regional/commuter airline aircraft."</i></p> <p>FACT - The Citizens of Carlsbad ONLY approved a General Aviation Basic Transportation Airport. Furthermore, the County agreed to that condition. The Citizens of Carlsbad never agreed to the airport growing beyond that definition.</p> <p>Please explain in detail why the citizens of Carlsbad and its approved airport should care about the conditions the County has created by mismanaging the Carlsbad approved B-II airport.</p> <p>Please explain in detail why even planes used by Cal Jet is the airports responsibility. If Cal Jet wants to fly its "wet leased" aircraft out of CRQ, the County should demand Cal Jet provide <u>today's newer aircraft</u> that can use CRQ present runway @ MTOW.</p> <p>Please explain in detail why Cal Jet is allowed to use 10 or 15 year old planes that produce tons and tons of GHG and higher levels of noise in a community who's life style is expressly a Healthy lifestyle.</p> <p>Please explain in detail is the County one more time putting its business interest ahead of the County's fiduciary responsibility to its citizens?</p>
# 75	Page 4-13	<p>Table 4.10 - Runway Takeoff and Landing Length Requirements, states the Gulfstream G650 @ MTOW requires a runway length of 6,500 ft. However, looking at Gulfstream's Specification sheet @ MTOW a runway of 5,858 is required.</p> <p>In digging deeper, the 6,500 ft length shown in the Master Plan comes from calculating the airport elevation and the mean maximum daily temperature of the warmest month. Keeping this simple, based on the 6,500 ft required for the hottest mean month, 642 ft more will be required for the G650 to fly to China without stopping.</p>

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		<p><u>The bottom line - CRQ's runway still will not be long enough!</u></p> <p>According to the above Qualcomm's G650 WILL still needs to stop at SAN and fill up. FYI - San Diego's runway is 9000 ft.</p> <p>That said, the following discrepancy arises in the County's explanation of why the runway must be extended the 800 ft:</p> <ol style="list-style-type: none"> 1. To allow Qualcomm's G650 to fly to China 100% of the time without stopping at San Diego to top off. NOT CORRECT. 2. The extension will not happen for another 13 years. <p>That is simply not believable. Is Qualcomm going to wait 13 years before it stops flying to San Diego to top off its tank - NOT likely.</p> <p>FYI - Master Plan's Schedule</p> <ol style="list-style-type: none"> 1. Near-term (0 to 7 years) 2. Intermediate-term (8 to 12 years) project 3. Long-term Projects (13 to 20 years) Project <p>Bottom Line, as we all suspect, the 800 ft extension will be required ASAP. Otherwise what is the benefit for the main reason to extend the runway.</p> <p>Please explain in detail why this is not a question needing to be answered.</p> <p>Additionally even with the additional 800 feet extension, the G650 still will not be capable of flying its stated 7,500 mile range. The new CRQ runway will be 161 ft too short in cold months and 642ft too short on hot months to allow it to take off at MTOW. OR to put it bluntly that plane will still need to stop at SAN to top off.</p> <p>Please explain in detail what is the real reason for the County to push this runway extension. It most certainly not as is stated in the Master Plan to allow a G650 to make it nonstop to China.</p>
# 76	An FAA Requirement Not in the	<p>Runway and Taxiway Separation Safety Requirements</p> <p>Nowhere in this plan did I see the fact that the present Runway</p>

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173-84

	Master Plan WHY?	and Taxiway separation is not in compliance with the FAA 400 ft. centerline to centerline separation requirement. Please explain in detail why by allowing C-III and D-III to routinely use the airport is the County <u>not living up to its fiduciary responsibility</u> to the safety of the person who use the airport on a daily basis and the community surrounding the airport.	173-84 cont.
# 77	Page 5-5	Conditional Use Permit 172 - First Paragraph - Sentence 5 <i>"The reference to the Airport in CUP-172 as a General Aviation Basic Transport Airport is an older weight based classification that has become functionally obsolete as the FAA no longer uses this terminology or the methodology on which it was based to establish design criteria for airports."</i> Nice try, but not true. When checking with the FAA, its documentation still list "General Aviation Basic Transport Airport" as an active description.. Please explain in detail when this will be corrected and the Master Plan will be rereleased for Public Comments.	173-85
# 78	Page 5-5	Conditional Use Permit 172 <i>The County notes that the design changes to the Airport addressed by this Master Plan remain consistent with the portions of CUP-172 that have not been rendered moot by the FAA.</i> Per SDCRAA, "a runway extension is an airport expansion." Please explain in detail what "portions of CUP-172 that have not been rendered moot by the FAA."	173-86
# 79	Page 5-5 & 5-6	Conditional Use Permit 172 Just a general comment -- the County attorney's have to be kidding. In the words of Bingaman Franklin - "Half a truth is often a great lie" With the boiler legal plate gobbledygook verbiage in this section that cannot be interpreted as even half the truth. This verbiage reminds me of my excuses when I was little and was caught with my hand in the cookie jar. For the County to spend so much verbiage trying to explain what obviously is an attempt to justify expanding the airport is insulting as a citizen of San Diego County. Please explain in detail why for 38 years the County complied with Carlsbad Ordinance 21.53.015 and CUP 172 and now is refusing to honor the Carlsbad LAW.	173-87
# 80	Page 5-7	Greenhouse Gases (GHG)	173-88

		<p>This whole section validates the County is not upholding its fiduciary responsibility to its citizens.</p> <p>Please explain in detail why the County would be considering an airport expansion when it has been proven an airport is the most polluted environment of all workplace environments.</p>	173-88 cont.
# 81	Page 5-7	<p>Greenhouse Gases</p> <p><i>"The runway improvements at McClellan-Palomar Airport would improve the efficiency of business jets operating in the County of San Diego. Currently, due to the runway limitations, certain cross-country and international business jet flights must make fuel stops enroute. This requires an additional landing-takeoff cycle which increases the amount of fuel burned in reaching the destination."</i></p> <p>If the airport is not big enough for these aircraft they need to use a more suitable airport.</p> <p>Please explain in detail why this is today's airport problem.</p>	173-89
# 82	Page 5-7	<p>Greenhouse Gases</p> <p><i>"With the runway improvements, the efficiency or "green benefits" of the project would help to offset overall fuel usage and, hence, greenhouse gas and other air quality emissions."</i></p> <p>Let me see if I understand this statement correctly. If the runway was extended, it is more beneficial to allow an aircraft (too big for the present B-II certified airport) to be able to takeoff with a full tank of fuel. In doing so, it will require more thrust to lift the now heavier aircraft resulting in more GHG be deposited in Carlsbad.</p> <p>Please explain in detail why allowing a now heavier jet taking off from Palomar and depositing more GHG's and jet soot is beneficial to Carlsbad and surrounding cities citizens.</p> <p>Please explain in detail why this is not in violation of the County Fiduciary responsibility to protect the health and safety of its citizens.</p>	173-90
# 83	Page 5-8	<p>Coastal Resources</p> <p><i>"The City of Carlsbad has a Local Coastal Program (LCP) that has been certified by the California Coastal Commission (1996, amended 2016). The Airport is located outside of the Coastal Zone and the City's LCP boundary."</i></p> <p>That statement is true about the airport, but what about the airport's larger and larger jets - the reason the airport is expanding.</p> <p>Carlsbad is NOT like San Diego. Carlsbad's small lagoons are extremely sensitive to GHG and jet soot pollutants.</p>	173-91

		<p>Please explain in detail with the airport being outside of the Coastal Zone and all the increased soot and polluting chemicals produced by the larger and larger jet dropping on these very sensitive lagoons will fall in and on the Coastal Zone, why this should not be a consideration of this plan.</p>	173-91 cont.
# 84	Page 5-8	<p>Compatibility Land Use/Noise</p> <p>This section talks a lot about noise to the west, but no talk about noise to the east and in the City of Vista, right under the landing path who have complained for 20 years or more about the aircraft noise.</p> <p>Please explain in detail WHY not and when will this explanation be incorporated in the Master Plan.</p> <p>Please explain in detail when the Master Plan will be rereleased with the above requested information incorporated.</p>	173-92
# 85	Page 5-9	<p>Compatibility Land Use/Noise</p> <p><i>"Airports inherently generate noise and although CRQ meets standards, it is acknowledged that noise may still be considered intrusive to those who may be within the flight path. In order to be a good neighbor, VNAP have been established to preserve quality of life for the community and place minimal voluntary restrictions on aircraft arriving and departing CRQ; the VNAP are presented in Exhibit 2.9"</i></p> <p>Please explain in detail WHY after 20 or more years of the VNAP and public complaints about aircraft noise, the complaints continue to grow.</p> <p>Please explain in detail WHY when the PAAC was asked what they do with the noise complaints the answer is ---"Nothing, we are only interested in the trending information."</p> <p>Please explain with the above two facts, how the County's above statement can possibly be true and correct.</p>	173-93
# 86	Page 5-14	<p>5.4.2.6 Department of Transportation (DOT) act: Section 4(f)</p> <p><i>"Section 4(f) of the Department of Transportation Act of 1966 (49 USC 303) protects against the loss of significant publicly-owned parks and recreation areas, publicly-owned wildlife and waterfowl refuges, and historic sites as a result of federally funded transportation projects. The Act states that a project which requires the "use" of such lands shall not be approved unless there is no "feasible and prudent" alternative and the project includes all possible planning to minimize harm from such use. In addition, the term "use" includes not only the physical taking of such lands, but "constructive use" of such lands. "Constructive use" of lands occurs when "a project's proximity impacts are so severe that the protected activities, features, or attributes that qualify a resource for</i></p>	173-94

		<p><i>protection under Section 4(f) are substantially impaired” (23 CFR Part 771.135)."</i></p> <p><u>Today, there are a number of parks, schools, play grounds and recreational facilities already impacted by the airport.</u> When the public complains about low flying aircraft and/or aircraft noise nothing is done the correct the issue.</p> <p>This plan is now projecting the airport will expand to include yet and larger aircraft and as airport traffic increases, NexGEN will demand the flight paths will spread out over the entire communities Carlsbad, Encinitas, Escondido, Oceanside, San Marcos, Vista and Valley Center. Look no farther than SAN airport for proof. When you do, you will see (since 2015) noise complaints are now coming from a 14 mile north and east radius from SAN airport.</p> <p>Fact - within a five (5) mile radius of the airport in just the City of Carlsbad are, 56 Schools, 67 Parks and Open Spaces, 19 Retirement/Senior Centers, 28 Churches, 9 Golf Courses and numerous historical sites.</p> <p>The previous list does not include downtown Carlsbad that relies exclusively on the tourist industry for its profitability. These tourist are drawn to the approximately seven (7) miles of Carlsbad beaches and are less than three (3) miles from today's small airport.</p> <p>Please explain in detail WHY even though the airport itself is not claiming use of the land protected by this DOT act, the product produced by the airport will without a doubt negatively impact the lands and area described in the act.</p> <p>Please explain in detail until the airport can prove it is not impacting the community as the DOT act states - why this Plan should not be withdrawn.</p>	173-94 cont.
# 87	Page 5-14	<p>5.4.2.6 Department of Transportation (DOT) act: Section 4(f)</p> <p><i>"Currently, the 65 dB CNEL for the Airport, extends over a portion of The Crossings golf course. As a result of the proposed improvements, this CNEL would cover a slightly different area in the future. With a runway extension, the CNEL would cover less of the golf course than if the runway is not extended. Since the improvements would not increase the amount of Section 4(f) lands affected by noise levels between 65 and 70 CNEL, and may actually reduce the amount of Section 4(f) land affected by Airport noise, no loss of Section 4(f) land or its uses would occur."</i></p> <p>That may be a correct statement, but other than the assumption of <i>"65 and 70 CNEL, and may actually reduce the amount of Section 4(f) land affected by Airport noise, no loss of Section 4(f) land or its uses would occur."</i></p>	173-95

		<p>However, with the larger and larger jet projections, it is more likely it MAY actually increase the amount of Section 4(f) land affected. Why? The aircraft's are climbing over this land and because they are heavier than today's aircraft, they will require more thrust to maintain flight.</p> <p>~ More thrust equals more noise and pollution. ~</p> <p>Fact - Cal Jet on takeoff creates 110 db reading three (3) miles SE of the airport each time it takes off. I can only assume that reading must be a much higher over the golf course and the communities between the airport and the coast.</p> <p>Let me also state I do know the CNEL is a 24 hour average reading. But since most of the larger business jets will be taking off outside of the quiet hours and the 10% penalty will apply. Therefore the CNEL readings will most likely be higher.</p> <p>Additionally, as previously mentioned, this Plan is projecting a completely different mix of larger and larger aircraft than presently using the airport. Therefore, the CNEL readings will be substantially different than those presented in this Plan.</p> <p>Please provide a detailed CNEL report simulating the aircraft type planned by this Plan.</p> <p>When that report is completed I am sure it will require a reissuance of the Plan for public comment.</p>	173-95 cont.
# 88	Page 5-14	<p>5.4.2.6 Department of Transportation (DOT) act: Section 4(f)</p> <p>Speaking of the 65 dB CNEL map. The map presented in ALL the public workshops and the County's presentation to the Carlsbad's City Council showed and stated the CNEL would not be greater than 65 db.</p> <p>But included in this section it states <i>"... Since the improvements would not increase the amount of Section 4(f) lands affected by noise levels between 65 and 70 CNEL, and..."</i></p> <p>Is this heightened reference already assuming the CNEL will be higher because of the larger and larger aircraft?</p> <p>Please explain in detail the above highlighted reference to more than 65 CNEL.</p> <p>If the above highlighted area is correct, please advise when the revised Plan will be reissued for Public Inspection with the supporting information.</p>	173-96
# 89	Page 5-14	5.4.2.7 Farmland	173-97

		<p>This section refers to land within the airport boundary. But with NexGEN and its mandate to allow planes to turn earlier than previously allowed farmland outside of the airports boundaries now become vulnerable.</p> <p>Please explain in detail the Plans process to assure jet soot and GHG pollutants will not fall and contaminate the surrounding farmland.</p>	173-97 cont.
# 90	Page 5-15	<p>5.4.2.6 Fish, Wildlife and Plants</p> <p>This section describes there is no impact to the bird population. But on Palomar's website today you will find the following the description - EXTENSIVE BIRD ACTIVITY IN VICINITY ESPECIALLY IN SPRING.</p> <p>With the obvious planned increase in commercial and larger business jet traffic, please explain in detail how EXTENSIVE BIRD ACTIVITY IN VICINITY ESPECIALLY IN SPRING and other times of the year will not endanger the surrounding communities if and when these birds get ingested into the jet engines and causes an emergency landing or worse.</p> <p>Please explain in detail the Plan's process to assure jet soot and GHG pollutants will not fall and contaminate the surrounding farmland bird and other wildlife habitat.</p>	173-98
# 91	Page 5-20 & 21	<p>5.4.2.15 Socioeconomic Impacts....</p> <p><i>"The amount annual growth anticipated in aircraft activity at the Airport in the future years is not anticipated to result in secondary impacts on the County or the City of Carlsbad."</i></p> <p>Let me see if I understand this statement correctly. The Plan projects approximately 550,000 enplanement and it has to be assumed an equal amount of deplanements in 20 years. But the 20 year timeframe is extremely suspect.</p> <p>That said, sometime in the future the Plan projects 1,100,000 passengers will be processed through Palomar airport. According to the Plan each one (1) enplanement/deplanement will require 2.67 vehicle trips getting or leaving the airport. Therefore, the TOTAL amount of additional ground vehicle traffic will increase to: $1,100,000 \times 2.67 = 6,062,481$ annual trips or 16,610 more trip per day.</p> <p>Evidently Carlsbad planed 20,000 plus population growth is not considered in this Plan calculation. Nor is there any planning for the surrounding communities of Vista, Oceanside, Encinitas, Escondido and San Marcos population growth.</p> <p>Consequently, this Plan seems unrealistic when it states "<i>activity at the</i>"</p>	173-99

		<p><i>Airport in the future years is not anticipated to result in secondary impacts on the County or the City of Carlsbad."</i> 16,610 more airport created trips per day will negatively impact Carlsbad, just like the traffic around SAN impact San Diego taking 20 minutes to go one (1) mile when traffic gets backed up because of the airport.</p> <p>Consequently, The County's statement is definitely not thought-out and not sufficient to solve the traffic problem this present Plan will create in Carlsbad, Encinitas, Escondido, Oceanside, Vista and San Marcos and has to be redone and reissued for Public Comment.</p>
# 92	Page 5-20 & 21	<p>5.4.2.15 Socioeconomic Impacts.... last paragraph page 5-20</p> <p><i>"Since the proposed runway improvements do not involve expanding airport operations beyond the existing Airport boundaries, the relocation of housing or businesses would not be necessary to implement the proposed project. Existing communities, transportation patterns, and planned development would not be disrupted. The Airport's projected annual growth in the future would not significantly change future growth in the Carlsbad area or have disproportionate adverse impacts on minority, low-income, or child populations. Therefore, no socioeconomic impacts would be associated with improvements proposed in this Airport Master Plan Update."</i></p> <p>WOW, evidently none of the County personnel have read the FAA or Orange County studies of property value devaluation around growing airports.</p> <p>Where is the calculations for that drop in property values of the class of homes in the communities around Palomar airport?</p> <p>The FAA property value depreciation report states "as an airport becomes noisier, property values will depreciate 18.6%" Orange County (OC) property value depreciation report for the class of homes surrounding the airport, "property values will depreciate 27.7%." OC's report breaks that number down further, "for every 1% increase in the average dB level, property values will decrease 1.38%."</p> <p>Taking the OC 27.7% proven average decrease in home value numbers, per Zillow Carlsbad's average home value is \$818,200 times 27.7% average decrease in value, equals a \$226,641 loss in home value directly as a result of the growing airport.</p> <p>This whole section need to be rewritten to include the reality of the the Airports surrounding communities population and decreased home values that will be socioeconomic impacted by the airport's impacts.</p> <p>When completed the whole plan needs to be reissued for</p>

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		Public Comment.
# 93	Page 5-21	<p>5.5 Airfield Alternatives</p> <p><i>"A no-build or "do nothing" alternative was examined as part of this Airport Master Plan Update, to gain perspective of what impacts would arise from taking no action and to provide a baseline condition for subsequent environmental analysis. Because this option did not accommodate projected levels of aviation demand nor did it enhance airfield safety, (notably not addressing standards issues affecting both existing and projected operations by ARC C-III and D-III aircraft), it was not examined further."</i></p> <p>The FAA <u>suggests</u>, it does not demand an airport look at expanding if an "X" amount of larger aircraft are using the airport. Furthermore, an airport has the option to limit the size of aircraft using its field, as Santa Monica is now doing.</p> <p>Carlsbad approved an airport with a 4700 ft runway, but somehow that runway has grown to 4897 ft. without asking or allowing Carlsbad VOTERS to approve that additional extension.</p> <p>Please explain where is it written <u>an airfield must expand?</u></p> <p>Please explain why the County has placed the safety of its citizens behind the interest of the business community.</p>
# 94	Page 5-22 - 5-41	<p>5.6.1 Airfield Alternative 1 - B-II Enhanced Facility thru Constrains regarding Airfield Alternative 6</p> <p><i>"An EMAS constructed to these specifications would support projected corporate jet aircraft activity at the Airport, but would not designed to accommodate larger commercial aircraft such as the Boeing 737 or similar models."</i></p> <p><u>The above is a very telling statement</u> - Boeing 737 seems to be a consideration in the Plans future operations of the airport. There is enough room to install an EMAS to fully stop the 737.</p> <p>In looking at the FAA 150-5220-22B document and Zodiac Arresting Systems video's, a 737 will come safely to a stop approximately 100 ft. before it can exit a 600 ft. long EMAS.</p> <p>That said and so many half truth's throughout the County's plan, like (the already debunked) the runway need to be extend to allow the G650 to fly nonstop to China, it is hard not to believe when and if this Plan gets approved, all of sudden it will be decided to place a 600 foot EMAS on the west end of the runway. There most certainly seems to be enough space (672 ft.) for that to happen.</p>

I73-100

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I73-101

I73-102

		 <p>Please explain why the above statements about the 737 and Palomar is incorrect.</p>	I73-102 cont.
# 95	Page 5-29 - 5-41	<p>Constrains Regarding Airfield Alternative 3, 4, 5, and 6</p> <p>In the constrains lists it states:</p> <ul style="list-style-type: none"> Eliminates north aircraft parking, reducing accommodation of projected levels of aviation demand. <p>However that statement is not exactly the way Supervisor Horn instructed in his December 16, 2015 statement. In that statement he said to paraphrase - <i>those people will need to go to other airports. We are planning a Big Commercial Operation here and they need to leave.</i></p> <p>Additionally, Palomar will still ONLY be a single runway airport, unlike SNA which has a runway for commercial jet and a separated runway for Class A and B aircraft.</p> <p>As such, by keeping the small aircraft landing on a single runway creates a critical safety problem.</p> <p>This is safety issue is already happening today. Fact, the larger C/D-III jets have to abort their landing approach because they are overtaking the slower B-II aircraft. The very aircraft the airport is designed and certified to safely handle.</p> <p>Please explain why the safety issue of slower plans Class A-I aircraft with approach speeds of 91 knots or much less will not create a greater safety issue when it is being overtaken by the faster jet with an approach speed of up to 161 knots.</p>	I73-103
# 96	Page 5-42	<p>5.7.6 Preferred Airfield Alternative - Paragraph 2</p> <p><i>The proposed improvements identified in Alternative 5 allow the Airport to accommodate D-III aircraft operations with the need for only two minimal modifications of standards for the ROFA north of Runway 06-24 and runway-aircraft parking south of Runway 06-24. For long-term development, an 800-foot runway extension should be considered to provide adequate length for corporate and potential commercial operations without the necessity of significant weight restrictions.</i></p> <p>As previously stated "so what." Fact - per the Plan only 22% of the operation in 2016 were jets. Of those there is not a breakdown of the class of jet operations.</p>	I73-104

		<p>Please explain in detail how the cost of this expansion is in the best interest of the 250,000 plus surrounding communities citizens whose lives and property value will be negatively impact by the County not upholding its fiduciary responsibility and placing the interest of a few owners of the large jets over the County's citizen interest.</p> <p>Please provide a detailed breakdown between Class B, C and D jets of the 22% jets describe in the Plans on Page 3-11.</p>	173-104 cont.
# 97	Page 5-42	<p>5.7.6 Preferred Airfield Alternative - Paragraph 3</p> <p><i>"This Airport Master Plan Update identifies recommendations for a 20-year planning period. In order to achieve all of the proposed actions of Alternative 5, a phased approach is recommended that addresses action items that can be completed in the near-term (0-7 years), intermediate-term (8-12 years), and longterm (13-20 years). For example, while it is recommended that the Airport Layout Plan depict an ultimate relocation and extension of 800 feet to Runway 06-24, depending on funding availability, it may be prudent to pursue an initial 200-foot extension, followed by the remainder of the needed length as AIP or State grant dollars become available."</i></p> <p><i>"...longterm (13-20 years)"</i> One more time this above statement makes no logical or financial sense.</p> <p>Please explain in detail why this statement is not believable. Especially, according to the County supplied Freedom of Information records report - Palomar has lost millions of dollars each year since 2011.</p>	173-105
# 98	Page 5-42	<p>5.7.6 Preferred Airfield Alternative - Paragraph 6 through Page 5-43 Paragraph 1</p> <p><i>"This easement must secure the right of flight with inherent noise and vibration above the approach surface, the right to remove existing obstruction, and a restriction against the establishment of future obstructions."</i></p> <p><i>It is a specific recommendation of this Airport Master Plan Update that the Airport obtain aviation easements for existing and ultimate approach RPZs, and if possible, obtain aviation easements for existing and ultimate departure RPZs. It is also recommended that the Airport pursue land acquisition for any and all existing and ultimate RPZs although this action may not be determined as practical."</i></p> <p><i>Pursuance of land ownership of some parcels will likely be extremely expensive. At a minimum, the Airport should demonstrate that it is taking all steps possible to protect land uses within existing and ultimate RPZs. These actions should not fall under the definition of "expansion" identified in CUP-172 as the size of the RPZs represent existing conditions."</i></p> <p>Please explain with this Plan why the County:</p>	173-106

		<ol style="list-style-type: none"> 1. Is ignoring its fiduciary responsibility to protect the property values of the surrounding communities citizens. 2. Is putting the interest of a very few before the interest of the 589,096 citizens this Plan will negatively impact. 	I73-106 cont.
# 99	Page 5-43	<p>5.7.7 Interim Last Paragraph</p> <p><i>"This alternative is similar in principle to Airfield Alternative 1 (Remain B-II); however, the intent of the Interim Airfield Alternative is to provide additional takeoff length as a temporary placeholder while the Airport transitions to a D-III facility. Furthermore,..."</i></p> <p>Please explain in detail how this Interim airfield complies with the FAA Advisory Circular 150/5300-13A's Runway/Taxiway 400 ft minimum separation requirements.</p>	I73-107
# 100	Page 5-44	<p>5.8 Passenger Terminal Alternatives</p> <p><i>"...Pal 2, it is recommended that the Airport preserve approximately 8,400 square feet of space for potential terminal improvements in the event that passenger activity exceeds forecasted demand. The County now owns Hangar 1, a 23,000 square-foot hangar adjacent to the passenger terminal. Hangar 1 sits on a 1.2-acre parcel that includes adjacent vehicle parking and an aircraft parking apron."</i></p> <p>Please explain why this is finically viable since the PAL 2 projections are 20 years away.</p>	I73-108
# 101	Page 5-52	<p>5.11 Preferred Development Strategy</p> <p>Please explain in detail how this section complies with the now mandatory 2015 FAA Advisory Circular 150/5300-13A runway taxiway 400 ft. requirements.</p>	I73-109
#102	Page 6-1	<p>6.1 Funding Sources</p> <p><i>"Potential funding sources for any proposed improvements at CRQ come in the form of federal grants, County funds and Airport revenue, and third party investment. The amount of funding available from these sources will depend primarily on future levels of aviation activity at CRQ and future federal funding reauthorizations. As a non-hub primary facility, CRQ is eligible for certain types of funding as described below."</i></p> <p>Please explain in detail how this section has any chance of federal funding since the Plan will not comply with the now mandatory 2015 FAA Advisory Circular 150/5300-13A runway taxiway 400 ft. requirements until 13 years after detailed projects go through the California CEQA approval Process.</p>	I73-110

#103	Page 6-5	<p>Tables shown on this page</p> <p>This table seems suspect in relation to published County reports.</p> <p>Please explain in detail why the Table 6.6 - Operating Revenues and Expenses do not show the same results as the County reported for the same years. According to the County when it responded to the FOIA request, it lost one to two million each of these, even after it included the million dollar annual grant from the FAA.</p>
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I73-111

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Response to Letter I73**Graham Thorley**

- I73-1** The County acknowledges these introductory comments; however, they do not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I73-2** These comments do not raise an issue concerning the analysis of adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I73-3** The County acknowledges the comments; however, they do not raise an issue concerning the analysis of adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. The County will include the comment as part of the Final EIR for review and consideration by the decision makers prior to a final decision on the Proposed Project.
- I73-4** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I73-5** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I73-6** This comment states the Draft PEIR does not discuss human health issues related to noise or greenhouse gas (GHG) emissions. As identified in the Draft PEIR and recirculated portions, noise and GHG emissions would result in less than significant impacts. Because this comment does not specifically identify an environmental issue with the PEIR analysis, no changes to the PEIR have been made in response to this comment.

Regarding the commenter's concern of aircraft noise, County staff reviewed this comment for any site-specific location data of the perceived noise. Although this comment letter does not contain a sufficient location, the commenter has previously provided input on the project that included a location for staff to further study or analyze the noted noise concerns. As such, County staff researched the location provided and confirmed the location is outside of the 65dB contour (i.e., less than 65dB) under all scenarios. Specifically, the existing noise condition at the location provided was estimated to be 41.70dB, and its future condition without the Proposed Project is estimated to be 41.45dB. Assuming full implementation of the Proposed Project (PAL 2), the estimated future noise condition would be 41.85dB. This is below the threshold of significance of 65dB CNEL. Although the comment pertains to existing noise conditions, there is no evidence the Proposed Project would result in significant noise impacts. Therefore, because the location would be outside of the 65dB contour, no significant noise impacts would occur, and no changes to the PEIR are required. Please refer to Master Responses

1 and 4 in addition to PEIR Appendix D for more information about the supplemental noise analysis conducted for additional locations.

- I73-7** This comment includes concluding remarks and a table of contents of additional comments to follow. They do not raise specific issues regarding the content of the PEIR, but will be included as part of the administrative record and made available to the County Board of Supervisors prior to a final decision on the Proposed Project.
- I73-8** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Please refer to **Master Response 5 (Airport Expansion / Public Vote)**. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I73-9** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I73-10** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I73-11** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I73-12** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I73-13** This comment requests the County to explain how the Master Plan Update would comply with various California legislation; however, the comment does not identify which legislative sessions are referenced. Regarding AB-32, please refer to the PEIR Section 3.1.5 (Greenhouse Gas Emission). Regarding AB-52, please refer to PEIR Section 3.1.3 (Cultural Resources). Regarding AB-198, AB-350, and AB-617, it is unclear which legislative session the commenter is referencing as multiple sessions identify these assembly bill numbers. Regarding SB-743, please refer to PEIR Section 2.5 (Transportation/Traffic). Because this comment does not specifically identify an environmental issue with the PEIR analysis, no changes to the PEIR have been made in response to this comment.
- I73-14** This comment discusses lead monitoring that was conducted at the Airport in 2012 and 2013. A discussion of this study was included in the Draft PEIR Chapter 3.1.2.1 in which it states the San Diego Air Pollution Control conducted an independent study concluding

lead concentrations do not exceed Federal standards. **Please also refer to Response to Comment I48-3.**

I73-15 The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Please refer to **Master Response 5 (Airport Expansion / Public Vote)**. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

I73-16 Please refer to **Master Response 2 (Public Review Period Extension)**.

I73-17 Please refer to **Response to Comment I73-15**.

I73-18 The comment asks why development from the past 30 years is not included in PEIR Table 1-4 (Cumulative Projects List). Projects developed 30 years ago would be considered part of existing conditions. The list of past, present, and reasonably foreseeable projects was prepared pursuant to CEQA Guidelines Section 15130.

The comment also states that PEIR Figure 1-7 is not labeled properly in the PEIR. The County disagrees as the illustration depicting the surrounding cumulative projects was accurately labeled as Figure 1-7. Its associated projects are titled in PEIR Table 1-4. No changes have been made to the PEIR.

I73-19 Please refer to **Response to Comment I73-15**.

I73-20 Although the commenter provides a quote from the aesthetics section of the Draft PEIR, the content of the comment pertains to hazardous materials. Specifically, the commenter is concerned that soil surrounding the runway could be contaminated with lead-fueled deposits requiring removal. As this comment does not specifically identify an environmental issue with the PEIR analysis or proposed mitigation, no changes to the PEIR have been made in response to this comment.

I73-21 This comment requests the County to identify various types of facilities and their quantities within two miles of the Airport. The County Guidelines for Determining Significance to Hazardous Materials dictate the types of facilities to be analyzed and their proximity to a project site. The environmental analysis provided in the PEIR Section 2.3.2 followed these guidelines, including whether the Proposed Project site would be located within one-quarter mile of various facilities (see Section 2.3.2 for a list of facilities). The County guidelines do not address potential hazardous materials impacts to these facilities outside of the one-quarter mile radius, nor do the guidelines require the review and identification of “churches, nursing homes, playgrounds, etc.” As stated in the PEIR, there are no schools or day care facilities located within one-quarter mile of the Airport. The closest school is Pacific Ridge School, which is located over 1.3 miles southeast of the Airport at 6269 El Fuerte Street.

The PEIR concluded the Proposed Project would result in less than significant impacts according to the thresholds involving specific facilities and their proximity to the Proposed Project site. Therefore, no changes to the PEIR have been made in response to this comment.

I73-22 The comment disagrees with the PEIR’s statement that there are no schools within one-quarter mile of the Airport. However, the comment does not provide evidence that the Master Plan Update would have a new significant effect on the environment.

This comment also cites various aircraft incidents and requests the PEIR to be updated citing aircraft incidents surrounding nearby schools. Please refer to **Master Response 6 (Existing Airport Activity)** discussing existing Airport activity. In addition, aircraft operations are an existing ongoing intended use at the Airport. The Master Plan Update proposes safety and operational efficiency improvements within the current airfield, and the Airport would continue to conduct activity similar to current conditions.

As this comment does not specifically identify an environmental issue with the PEIR analysis or proposed mitigation, no changes to the PEIR have been made in response to this comment. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project, and no further response is required.

- I73-23** The comment identifies a typographical error in the spelling of “Master” Plan. The misspelling has been corrected in the PEIR.

The comment also states that although the PEIR includes a range of project alternatives, the public might review only the Proposed Project. The comment requests the PEIR be revised to clarify whether all alternatives will be viable in the future or why these alternatives were not removed from the PEIR. The PEIR was prepared in accordance with the CEQA Guidelines §15126.6, which states that an EIR must describe a range of reasonable alternatives to the Proposed Project. Accordingly, the PEIR was prepared pursuant to CEQA Guidelines by describing the Proposed Project and providing other alternatives as described in the Master Plan Update for consideration and environmental analysis. This analysis is provided in Chapter 4 of the PEIR.

The County Board of Supervisors is the decision-making body for the Proposed Project. As this comment does not specifically identify an environmental issue with the PEIR analysis or proposed mitigation, no changes to the PEIR have been made in response to this comment. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

- I73-24** The commenter asks why no projections of ambient noise were included in the PEIR or Master Plan Update. As discussed in Section 2.4.2.1, the noise analysis prepared for the PEIR takes into account the forecasted growth in operations, including growth in commercial aircraft operations, as well as introduction of new aircraft for each scenario analyzed under future year (2036) conditions.

- I73-25** In response to comments received from the original circulation of the PEIR, revisions have been made to the Greenhouse Gas Emission analysis. Please refer to the Final PEIR, Section 3.1.5 – Greenhouse Gas Emissions, recirculated for public review from June 21 through August 6, 2018.

The comment also requests the County to explain how the Master Plan Update would comply with various California legislation; however, the comment does not identify which legislative sessions are referenced. This topic was previously raised by the commenter. Please refer to **Response to Comment I73-13**.

- I73-26** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

I73-27 Please see **Master Response 5 (Airport Expansion/Public Vote)** for discussion of City of Carlsbad Code Section 21.53.015 and CUP 172. No changes to the PEIR have been made in response to this comment.

I73-28 The Draft PEIR Chapter 3.1.2 included an analysis of potential air quality emissions resulting from the Master Plan Update. The PEIR concludes that the Master Plan Update would not result in a significant air quality impact. The land uses cited by the commenter are existing land uses as approved by the San Diego County Regional Airport Authority, FAA, and the City of Carlsbad. As noted, the PEIR was prepared to analyze potential environmental effects associated with the proposed activities identified in the Master Plan Update through 2036. CEQA Guidelines do not require an agency to analyze effects of the Airport's existing operational activity, but to look at the potential impacts associated with implementation of the Proposed Project.

The published Draft PEIR Section 3.1.7 also analyzed land use compatibility and consistency with the adopted Airport Land Use Compatibility Plan, and determined impacts would be less than significant. The PEIR describes existing land uses and policies associated with the Airport and within its vicinity.

As this comment does not specifically identify an environmental issue with the PEIR analysis or proposed mitigation, no changes to the PEIR have been made in response to this comment.

I73-29 This comment asserts that the PEIR did not discuss the lead monitoring study that was conducted at the Airport in 2012 and 2013. A discussion of this study was included in the Draft PEIR Chapter 3.1.2.1 in which it states the San Diego Air Pollution Control conducted an independent study concluding lead concentrations do not exceed Federal standards. As noted, a lead monitor was initially stationed at the Airport in 2012 by the U.S. Environmental Protection Agency (USEPA). However, due to concerns over the USEPA's methodology and testing protocol, the San Diego Air Pollution Control District (SDAPCD) conducted their own independent lead study that found USEPA's monitoring station was unsuitable to accurately document lead exposure levels at the Airport. Specifically, the monitor was stationed immediately adjacent to the primary "run-up" area, where aircraft engines are run at relatively high power settings to check engine components and propellers prior to take-off. This location is in very close proximity to piston-driven aircraft engines running at relatively high power settings and localized exhaust emissions, rather than ambient air to which the public could be exposed. SDAPCD emphasized to the USEPA that this run-up area is not representative of air quality in areas readily accessible to the public. Instead, SDAPCD conducted monitoring at numerous locations where pilots, passengers, airport personnel, and the public have access. The results from SDAPCD were published in the Lead Gradient Study at McClellan-Palomar Airport. The report concluded that the location with the highest lead concentrations would not exceed NAAQS thresholds. Furthermore, according to lead emissions data from USEPA's air quality system, this Station most recently reported a 3-month rolling average of 0.02 micrograms per cubic meter when the Draft PEIR was published (which is well below the federal NAAQS standard of 0.15).

I73-30 As this comment does not specifically identify an environmental issue with the PEIR analysis or proposed mitigation, no changes to the PEIR have been made in response to this comment.

The Master Plan Update does not propose changes to the number of passengers allowed by Policy F-44. For a discussion of the forecasted critical aircraft, please refer to Section

3.10.3 of the Master Plan Update as well as Sections 3.9 and 3.10 for a discussion of air carrier operations forecast during the next 20-year planning period.

I73-31 Please refer to **Master Response 5 (Airport Expansion/Public Vote)** for a discussion of CUP 172. Furthermore, as noted in the PEIR Section 3.1.7.2 (page 3-89), at the time CUP-172 was obtained, the FAA used a weight-based standard to describe the design characteristics of airports. Shortly after CUP-172 was approved, the weight-based standards were replaced by an Airport Reference Code (ARC) system that primarily looks at approach speed and airframe dimensions to develop airfield design criteria. The reference to the Airport in CUP-172 as a General Aviation Basic Transport Airport is an older weight-based classification that has become functionally obsolete as the FAA no longer uses this terminology or the methodology on which it was based to establish design criteria for airports. As this comment does not specifically identify an environmental issue with the PEIR analysis or proposed mitigation, no changes to the PEIR have been made in response to this comment.

I73-32 Please see **Master Response 5 (Airport Expansion/Public Vote)** for discussion on the applicability of City of Carlsbad Code Section 21.53.015.

I73-33 Please see **Master Response 5 (Airport Expansion/Public Vote)** for discussion on the applicability of City of Carlsbad Code Section 21.53.015.

I73-34 This comment requests the County to address GHG emissions, jet fuel soot, and groundwater contamination as a result of a potential aircraft crash. The comment also expresses concerns with potential air quality emissions due to idling traffic. The comment requests a projection of additional soot that could be generated by the additional aircraft operations projected in the Master Plan Update.

As identified in the Draft PEIR and recirculated portions, GHG emissions, air quality, and water quality would result in less than significant impacts. Specifically, while soot is a byproduct of fuel combustion, it is considered a form of fine particulate matter, which was studied and analyzed as part of the Draft PEIR and Air Quality Impact Technical Report. The PEIR concludes that the Master Plan Update would not result in a significant air quality impact.

Also, please refer to **Master Response 6 (Existing Airport Activity)** discussing existing Airport activity. Aircraft operations are an existing ongoing intended use at the Airport. The Airport Master Plan Update proposes safety and operational efficiency improvements within the current airfield, and the Airport would continue to conduct activity similar to current conditions. No changes to the PEIR have been made in response to this comment.

I73-35 The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

I73-36 The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

- I73-37** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I73-38** The County acknowledges this comment; however, it does not provide evidence of an error in the CEQA analysis nor evidence of a new significant effect, concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I73-39** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I73-40** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I73-41** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I73-42** This comment states the PEIR does not discuss human health issues related to noise or greenhouse gas (GHG) emissions. This topic was previously raised by the commenter. Please refer to **Response to Comment I73-6**. No further response is required.
- I73-43** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I73-44** Please refer to **Master Response 6 (Existing Airport Activity)**, and **Master Response 9 (Increase in Aircraft Operations)**. Please also see **Response to Comment I73-22**.
- I73-45** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I73-46** Please refer to **Master Response 6 (Existing Airport Activity)** and **Master Response 9 (Increase in Aircraft Operations)**. Please also see **Response to Comment I73-22**.

- 173-47** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- 173-48** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- 173-49** Please refer to **Master Response 5 (Airport Expansion/Public Vote** and **Master Response 9 (Increase in Aircraft Operations)**.
- 173-50** Please refer to **Master Response 5 (Airport Expansion/Public Vote)**.
- 173-51** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- 173-52** The County acknowledges the comments; however, they do not raise an issue concerning the analysis of adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- 173-53** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- 173-54** Please refer to **Master Response 5 (Airport Expansion/Public Vote)**.
- 173-55** The County acknowledges the comments; however, they do not raise an issue concerning the analysis of adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- 173-56** The County acknowledges the comments; however, they do not raise an issue concerning the analysis of adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- 173-57** The County acknowledges the comments; however, they do not raise an issue concerning the analysis of adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

- 173-58** The County acknowledges the comments; however, they do not raise an issue concerning the analysis of adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- 173-59** The County acknowledges the comments; however, they do not raise an issue concerning the analysis of adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- 173-60** Public input regarding the PEIR was conducted pursuant to the requirements of CEQA. Public comments on the Notice of Preparation are included in Appendix A of the Final PEIR.
- 173-61** Please refer to **Master Response 6 (Existing Airport Activity)**.
- 173-62** Please refer to **Master Response 5 (Airport Expansion/Public Vote)** and **Master Response 9 (Increase in Aircraft Operations)**.
- 173-63** The County acknowledges the comments; however, they do not raise an issue concerning the analysis of adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- 173-64** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- 173-65** Please refer to **Response to Comment 172-16**.
- 173-66** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- 173-67** Please refer to **Master Response 4 (Noise Monitors and PEIR Calculations)** and **Master Response 6 (Existing Airport Activity)**.
- 173-68** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- 173-69** Please refer to **Master Response 3 (Voluntary Noise Abatement Procedures)** and **Master Response 4 (Noise Monitors and PEIR Calculations)**.

- I73-70** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I73-71** Please refer to **Master Response 5 (Airport Expansion/Public Vote)**.
- I73-72** Please refer to **Master Response 5 (Airport Expansion/Public Vote)**.
- I73-73** Please refer to **Master Response 3 (Voluntary Noise Abatement Procedures)** and **Master Response 4 (Noise Monitors and PEIR Calculations)**.
- I73-74** Please refer to **Master Response 3 (Voluntary Noise Abatement Procedures)**, **Master Response 4 (Noise Monitors and PEIR Calculations)** and **Master Response 6 (Existing Airport Activity)**.
- I73-75** Please refer to **Master Response 8 (Commercial Airline Service)**.
- I73-76** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I73-77** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I73-78** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I73-79** Please refer to **Master Response 5 (Airport Expansion/Public Vote)**.
- I73-80** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I73-81** Please refer to **Master Response 5 (Airport Expansion/Public Vote)** and **Master Response 9 (Increase in Aircraft Operations)**.
- I73-82** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. However, please refer to **Master Response 5 (Airport Expansion/Public Vote)** and **Master Response 9 (Increase in Aircraft Operations)**.

- I73-83** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. However, please see **Master Response 5 (Airport Expansion/Public Vote)** and **Master Response 9 (Increase in Aircraft Operations)**.
- I73-84** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. However, please see **Master Response 6 (Existing Airport Activity)**.
- I73-85** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I73-86** Please refer to **Master Response 5 (Airport Expansion/Public Vote)**.
- I73-87** Please refer to **Master Response 5 (Airport Expansion/Public Vote)**.
- I73-88** This comment states the Airport is a GHG polluted environment and asks why the County would consider would the Proposed Project. Regarding GHG emissions, please refer to **Response to Comment I73-6**. Furthermore, the comment does not specifically identify a deficiency or environmental issue with the Draft PEIR analysis. No changes were made to the PEIR, and no further response is required.
- I73-89** This comment includes an excerpt from the Master Plan Update regarding fuel efficiencies and recommends larger aircraft to use a more suitable airport. The comment does not specifically identify a deficiency or environmental issue with the PEIR analysis. Please refer to **Master Response 5 (Airport Expansion / Public Vote)** and **Master Response 6 (Existing Airport Activity)**. No changes were made to the PEIR, and no further response is required.
- I73-90** This comment includes an excerpt from the Master Plan Update that states the Proposed Project may result in “green benefits” by reducing the need for aircraft to refuel at an additional airport. This quoted statement from the Master Plan Update was not incorporated in the PEIR’s assumptions or analysis. Therefore, while there may be environmental benefits from aircraft no longer needing to refuel at a local or regional airport, this efficiency was not assumed in the PEIR’s quantified air quality or GHG analyses. Furthermore, as identified in the PEIR and recirculated portions, air quality and GHG emissions would result in less than significant impacts. Therefore, no changes to the PEIR have been made in response to this comment.
- This comment also requests an explanation why soot would not be considered as part of the Master Plan Update or PEIR. Please refer to **Response to Comment I73-34**, which confirms that fine particulate matter was studied and analyzed as part of the PEIR and Appendix F - Air Quality Technical Report.
- I73-91** Please refer to **Response to Comment I73-34**.
- I73-92** This comment refers to existing noise conditions east of the Airport. Please refer to **Master Response 6 (Existing Airport Activity)**. The purpose of PEIR Section 2.4.1 is to describe the areas immediately surrounding where the Airport in order to establish the noise setting for the Proposed Project. The County used FAA’s methodology for determining the location and extent of airport noise impacts, and as discussed used a full

year of actual flight data to establish the existing conditions regardless of jurisdictional boundaries.

- I73-93** Please see **Master Response 3 (Voluntary Noise Abatement Procedures)**.
- I73-94** This comment refers to existing aircraft operations not specifically associated with the Master Plan Update. Please refer to **Master Response 6 (Existing Airport Activity)**.
- I73-95** This comment refers to existing aircraft operations not specifically associated with the Master Plan Update. Please refer to **Master Response 6 (Existing Airport Activity)**.
- I73-96** The comment cites an excerpt from the Master Plan Update pertaining to noise conditions. However, the published PEIR is the environmental document prepared for the Proposed Project pursuant to CEQA. The comment does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088.
- I73-97** Please see **Response to Comment I73-34**.
- I73-98** Please see **Response to Comment I73-34**.
- I73-99** The County acknowledges this comment; however, socioeconomic is not an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I73-100** The County acknowledges this comment; however, socioeconomic is not an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I73-101** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I73-102** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I73-103** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I73-104** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for

review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

- I73-105** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I73-106** The County acknowledges the comments; however, they do not raise an issue concerning the analysis of adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I73-107** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I73-108** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I73-109** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I73-110** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.
- I73-111** The County acknowledges this comment; however, it does not raise an issue concerning the analysis or adequacy of the PEIR pursuant to CEQA Guidelines Section 15088. Therefore, no further response is required. This comment is included in the Final PEIR for review and consideration by the County Board of Supervisors prior to a final decision on the Proposed Project.

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Comment Letter I74

From: Kari Banigo <kbanigo@me.com>
Sent: Monday, March 19, 2018 2:12 PM
To: LUEG, PalomarMP
Subject: Airport expansion

We live just north of the airport and current noise/pollution is intolerable. Let the people VOTE — as required by the ordinance that states we have a right to weigh in for any airport expansion. Stop the shady shenanigans by calling it an extension. If the people really want it, they will vote for it. I am concerned about the increase in noise, pollutants and toxic hazards that will be unearthed during construction and beyond.

I74-1

I74-2

—Kari Banigo

Response to Letter I74**Kari Banigo**

I74-1 Please refer to **Master Response 5 (Airport Expansion/Public Vote)**.

I74-2 The comment expresses concern with increased pollutants associated with construction elements of the Master Plan Update. The Draft PEIR Chapter 3.1.2 included an analysis of potential air quality emissions resulting from construction of the Master Plan Update. The PEIR concluded that the Master Plan Update would not result in a significant air quality impact. As this comment does not specifically identify an environmental issue with the PEIR analysis or proposed mitigation, no changes to the PEIR have been made in response to this comment.

Regarding the commenter's concern of aircraft noise, County staff reviewed this comment for any site-specific location data of the perceived noise. However, the comment does not contain a sufficient location for the County to further study or analyze the noted noise concerns. Although the comment pertains to existing noise conditions, there is no evidence the Proposed Project would result in significant noise impacts. Please refer to Master Responses 1 and 4 in addition to PEIR Appendix D for more information about the supplemental noise analysis conducted for additional locations.